



## MEETING MINUTES

Subject/Purpose : 211<sup>th</sup> RCC (Caucus) Meeting No. 2023-04  
 Date & Time : 10 March 2023, 9:00 AM to 3:00 PM  
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### ATTENDEES

	Name	Designation/Position	Department/Company
1	Jesusito G. Morillos	Chairperson, Independent	RCC
2	Jose Roderick F. Fernando	Member, Independent	RCC
3	Jordan Rel C. Orillaza	Member, Independent	RCC
4	Rachel Angela P. Anosan	Member, Independent	RCC
5	Dixie Anthony R. Banzon	Member, Generation Sector	RCC
6	Cherry A. Javier	Member, Generation Sector	RCC
7	Jessie B. Victorio	Member (Alternate), Generation Sector	RCC
8	Michelle S. Tuazon	Member (Alternate), Generation Sector	RCC
9	Ryan S. Morales	Member, Distribution Sector	RCC
10	Manuel Luis N. Zagala	Member (Alternate), Distribution Sector	RCC
11	Gian Karla C. Guitierrez	Member, Supply Sector	RCC
12	Dennis R. Paragas	Member (Alternate), Supply Sector	RCC
13	Darryl Lon A. Ortiz	Member, Transmission Sector	RCC
14	Clark N. Agustin	Member (Alternate), Transmission Sector	RCC
15	John Paul S. Grayda	Member, Market Operator	RCC
16	Kristoffer Monico S. Ng	Member (Alternate), Market Operator	RCC
17	Karen A. Varquez	RCC Secretariat	PEMC
18	Divine Gayle C. Cruz	RCC Secretariat	PEMC
19	Dianne L. De Guzman	RCC Secretariat	PEMC
20	Melanie C. Papa	Observer	DOE
21	Peter Lee U	Chairman, CC/Proponent	CC
22	Primo M. Lim III	Member, CC/Proponent	CC
23	Ferdinand Villareal	Member/Proponent	MSC
24	Ma. Hazel M. Gubaton-Lopez	CC/Proponent Secretariat	PEMC
25	Mark Anthony C. Andrada	CC/Proponent Secretariat	PEMC
26	Paolo C. Alegre	CC/Proponent Secretariat	PEMC
27	Darlene C. Dublar	CC/Proponent Secretariat	PEMC
28	Alyssa Isabella R. Punzalan	CC/Proponent Secretariat	PEMC
29	Anthony Jose P. Asprer	CC/Proponent Secretariat	PEMC
30	Kassandra Fleur Elaine D. Domingo	CC/Proponent Secretariat	PEMC
31	Dianne Kate C. Langit	CC/Proponent Secretariat	PEMC
32	Gabbor M. Dichoso	CC/Proponent Secretariat	PEMC
33	Hilary Romeli C. Florendo	CC/Proponent Secretariat	PEMC



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	Name	Designation/Position	Department/Company
34	Carl Angelo B. Dela Cruz	CC/Proponent Secretariat	PEMC
35	Jeffrey B. Torejo	CC/Proponent Secretariat	PEMC
36	Bienvenido C. Mendoza Jr.	Market Assessment Group – Head	PEMC
37	Aldjon Kenneth M. Yap	Market Assessment Group	PEMC
38	Ira Lee P. Correctico	Market Assessment Group	PEMC
39	Charmaine Joyce M. Navarro	Market Assessment Group	PEMC
40	Marlo S. Delizo	Market Assessment Group	PEMC
41	Jake Jerald M. Gines	Market Assessment Group	PEMC
42	Ruben L. Sibayan	Market Assessment Group	PEMC
43	Armie Eloisa V. Exporna	Market Assessment Group	PEMC
44	Rolando L. Cabacang Jr.	Market Assessment Group	PEMC
45	Kevin John Y. Dela Cuesta	Market Assessment Group	PEMC
46	Joshua Angelo M. Ocampo	Market Assessment Group	PEMC
47	Fortunato C. Leynes	Chief Governance Officer	PEMC
48	Christin Paula E. Delgado	Secretariat, Office of the President	PEMC
49	Mario R. Pangilinan	Commenter	TC
50	Darryl Dennise D.G. Estrella	Commenter	MERALCO
51	Joebet Isaac V. Del Rosario	Commenter	MERALCO
52	Rolly Bolledo	Commenter	ACEN
53	Arjay M. Tolentino	Commenter	ACEN
54	Michael Q. Javier	Commenter	NGCP
55	Ermelindo R. Bugaoisan Jr.	Commenter	NGCP
56	Homernico Mari B. Palma	Commenter	NGCP
57	Mikaela Victoria	Commenter	NGCP
58	Vicente N. Loria	Commenter	NGCP
59	Jayson Jamandra	Commenter	APC
60	Lex Magtalas	Commenter	APC
61	Noriel Christopher R. Reyes	Observer	DOE
62	Marvin Jay. Masanda	Observer	DOE
63	Sherrie Mae C. Lago	Observer	ERC
64	Sharon O. Montaner	Observer	ERC
65	Edward I. Olmedo	Market Operator	IEMOP
66	Edwin N. Mosa	Market Operator	IEMOP



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## 1.0 Call to Order

The meeting was called to order at 09:02 AM.

There were seven (7) principal and two (2) alternate members present.

## 2.0 Adoption of Agenda

The agenda was adopted, as presented.

## 3.0 New Business

3.1 Deliberation of the Proposed Amendments to the WESM Rules and Dispatch Protocol Manual regarding Maximum Available Capacity [Proponents: Market Surveillance Committee (MSC) and Compliance Committee (CC)]

- Presenter/s: Market Surveillance Committee (MSC) and Compliance Committee (CC)
- Action Requested: For discussion and deliberations of Proponent's response on the comments received.
- Material/s: Annex A - Matrix of the Proposed Amendments to the WESM Rules; Annex B - Matrix of the Proposed Amendments to the Dispatch Protocol Manual regarding Maximum Capacity

3.2 Proceedings:

- Ms. Divine Gayle C. Cruz (Secretariat) informed the body that the proposal received comments from Technical Committee (TC), Aboitiz Power Corporation (APC), Meralco, AC Energy (ACEN), and National Grid Corporation of the Philippines (NGCP).
- On behalf of the Proponents, Mr. Joshua Angelo M. Ocampo (PEMC) led the discussion on the proposal and the Proponent's responses to the comments received.

### On General Comments, the following matters were raised:

1. On the Trading Participant's actions, i.e. (a) opening the breaker or (b) submission of low ramp-rate, to find a way around the dispatch scheduling process without breaching the Must-Offer Rule (MOR), the MSC/CC inquired about the TC's sentiments on such action.

Mr. Mario R. Pangilinan (TC) responded that his view on opening a breaker is part of the unit commitment process wherein the Generator Company (Genco) will decide when they will come into the system. Whether the Trading Participant (TP) opens the breaker or withholds its capacity, it cannot be determined as a breach since it is already part of the process.



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Mr. Ocampo, on behalf of the Proponent, inquired if this meant that PEMC should educate the TPs that such action may have an impact on the market. Mr. Pangilinan (TC) responded that there has been a lot of information disseminated regarding this. In fact, the issue of withholding capacity has existed since the opening of the market. The TP is taking advantage on the loopholes in the rules by opening the breaker or submitting low ramp-rate to circumvent the dispatch scheduling process without violating the MOR principle, which indicates the advanced knowledge of the Trading Participants.

Mr. Pangilinan added that the TC's general comment summarizes their insights on the proposed amendments, which they do not believe as the solution to the defined problem. The problem might be systemic and may not be addressed despite numerous proposed amendments to the rules. He suggested further discussing the comments pointed out in the general comments before proceeding to the line-by-line deliberation.

2. On TC's general comments regarding its suggestion on adding the reduction of the undesirable market outcomes to the purpose of the proposed amendment, Mr. Ocampo said that the Proponent proposed to strengthen the objective of the MOR, which is to offer maximum available capacity. The primary objective is to put in place a more stringent process to monitor the behavior of the TPs in complying to the MOR. The Proponent agreed with the TC, and they believe that it is the secondary objective. Mr. Pangilinan noted the response.
3. On the matter of identifying the problem to be addressed by the proposed amendment, Mr. Jordan Rel C. Orillaza (Independent) pointed out the significance of the TC's general comments. He suggested that before moving forward to the line-by-line discussion the body must agree on the principles and values of the market.

Mr. Jesusito G. Morillos (Independent) agreed with Mr. Orillaza. Considering the opening of the breaker is not a breach, he asked if it is possible to have a monitoring in the market to identify if such action is intentional or has frequent pattern that needs to be arrested with stronger policy.

As a former Head of Enforcement and Compliance Office, Ms. Rachel Angela P. Anosan (Independent) informed the body that the proposal is responding to a problem that has existed before. She said there are TPs that submit offers without the intention to operate/generate and manipulate the breaker status of the plant. She thinks that the proponent is trying to address the issue that there should be an intention to operate/generate so that all associated behavior should be consistent with the offer. It may not be the solution to the withholding capacity, but it could address the problem. Therefore, there is still value to consider the Proponent's proposal.

In line with Ms. Anosan comments, Mr. Morillos inquired if it is valid to conclude that the occurrence of undesirable market outcomes is due to the practices such as opening the breaker or submitting low ramp-rate.



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Mr. Pangilinan responded that the TC did not conclude that the problem is the undesirable market outcome. He said that if the proponent identifies the problem as compliance issue, then the body can formulate rules to address the problem. However, it does not mean that it will result to better market outcomes.

Mr. Ferdinand Villareal (MSC) expressed that undesirable market outcome is beyond the point. He pointed out that the intention of the TP to offer is the subject of concern.

To simplify the identification of the problem, Ms. Cherry A. Javier (Generation) suggested focusing the discussion on flagging the ECO/MSC and providing explanation whenever the TPs open their breaker or submit lower ramp-rates.

Mr. Fortunato C. Leynes (PEMC) suggested establishing the conditions to be considered (e.g. no fuel, shutdown, etc.,) whenever the TPs open their breaker.

Ms. Anosan reiterated that the proposed amendment is trying to address compliance to the MOR rather than the undesirable market outcome.

Mr. Pangilinan said that their general comments on the proposal as a systemic issue might be irrelevant if the body agreed that the proposal focuses on compliance issues.

Ms. Ma. Hazel M. Gubaton-Lopez (PEMC) expressed that opening the breaker would not necessarily constitute a breach of the rules. The proposal is intended to allow the ECO to check the reasons for opening the breaker. With this, Mr. Orillaza suggested adding their monitoring as a supplementary document to the proposal. He also suggested that the next step to solve this problem is to monitor the number of times that the opening of the breaker happens and the effects of doing so. However, he highlighted that the problem should not be confined to compliance issues because it influences the market.

Agreeing to Ms. Javier's comments and as response to Mr. Orillaza's comments, Mr. Morillos said the proposal should be limited to compliance with the end in view of finding a connection and solution on the effect to the market.

Mr. Jose Roderick F. Fernando (Independent) agreed that the compliance issues must be discussed first, and the rules change will be according to the compliances required in the market.

Highlights of the line-by-line deliberation were as follows:

### 1. WESM Rules 3.5.5.1

Mr. Orillaza inquired about the reason for revising the provision. He highlighted that the keyword of the provision is standing offer, also known as registered capacity. In line with the proposed provision, he also inquired if the TP must declare somewhere its MAC for a long



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period or for every trading interval, if the TP submits below its registered capacity. Mr. Ocampo responded that MAC will be validated by ECO. Currently in the NMMS, once the TP offers less than its registered capacity, the TP provides their initial reason. The Proponent proposed inserting the **“equivalent to the registered capacity or maximum available capacity”** to have a stronger point for the TPs to offer their capacity equal to their registered capacity or MAC.

Mr. Pangilinan reiterated that, per TC’s comments, the market cannot be operated in isolation of the PGC because, by all indications, it is a physical market. On the part of availability, he explained that the PGC has a provision requiring the Generator to declare its availability which starts day-ahead. Once the Generator declares its availability, it should be able to comply with the dispatch based on its availability or MAC and if the Generator cannot comply with the dispatch that would be considered as an outage. On the part of capability, when the Generator has capacity, although available but has energy constraints, the Generator cannot offer its registered capacity. That being so, the PGC also requires the Generator to declare its capability over a specified period of time. Therefore, the standing offers will not equate to the capability or availability, and the actual performance of the Generating Companies should be measured.

With regards to Mr. Ocampo’s statement on NMMS, wherein the TP can provide its initial reason for offering less than the registered capacity, Mr. Dixie Anthony R. Banzon (Generation) clarified that it is allowed in the old MMS not in the current MMS, which automatically flags as non-compliance to offering the registered capacity.

Mr. Pangilinan pointed out how to measure the performance of the physical market and compliance on the market will not necessarily reflect the actual performance of the power system or the grid. He added that every rule could be implemented on the market, but there are realities associated with the operation on the grid, where performance and reliability risk should be measured.

Ms. Gubaton-Lopez clarified that even without the insertion of the **“equivalent to the registered capacity or maximum available capacity”** there are other provisions in the WESM rules which state that the offer should include information specified in the Appendix A1.1 of the WESM Rules. As specified in Appendix A1.1, the generation offers required the maximum available capacity. With that, the Proponent intends to directly require the TP to offer its MAC. The registered capacity is already in the NMMS, which automatically flags if the TP offers below its registered capacity. But it is important to provide information on the MAC because it will recognize the conditions of the plant at the time of their offer (e.g. derating, outages, or other technical constraints).

NGCP’s proposed revision on the WESM 3.5.5.1 are already covered in Clause 6.1.8 of the Dispatch Protocol Manual. As response, the Proponent suggested to retain its proposed wordings and proposed to revise the 6.1.8 of DP Manual, as follow:





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**“6.1.8 Pursuant to WESM Rules Clause 3.5.11.6, Trading Participants that cancel their bids or offers, or submit bids or offers less than the registered capacity or maximum available capacity of their facility or generating unit are required to provide ~~information on the~~ justifiable reasons or circumstances of such cancellation or submission.”**

Ms. Anosan pointed out that the rationale of inserting the MAC in the WESM Rules Clause 3.5.5.1 is to make the statement straightforward. She suggested considering the NGCP's proposed wordings to make the structure/style of the rule consistent. This is seconded by Mr. Orillaza. He added that the structure of the rules could be concise or could have pointers (e.g. footnote references).

### 2. WESM Rules 3.5.11.5

On the matter of TC's comment regarding the use of “plant breaker” instead of “circuit breaker,” the Proponent proposed to revise the former to “generator breaker” to be consistent with the term used in Clause 2.5.4.7 of Registration, Suspension, and De-Registration Criteria and Procedures Manual. Mr. Orillaza commented that the term “generator breaker” might be confusing and suggested using the term “generator circuit breaker” instead.

Mr. Primo M. Lim III (CC) asked if the term “generator circuit breaker” will not create any misinterpretation in the rules considering that the market network model provides a resource ID with several generators connected. Mr. Pangilinan responded that the TC's assumption on the term “plant breaker” or “circuit breaker” refers to market network model.

Mr. Edward Olmedo (IEMOP/MO) said that an aggregated or combination of multiple generating units is considered as one market resource, but all generators are still modeled. Such that for two generating units with request for aggregation, if any of its generator circuit breaker closes will represent the whole generating resource as online in the market network model system.

Mr. Ocampo acknowledged the suggestion of the body and said to incorporate the term in Clause 2.5.4.7 of RSDCP Manual.

With regards to the proposed revision in Clause 3.5.11.5 (a), Mr. Orillaza inquired if the Proponent would like TPs to declare their MAC as zero if the TPs decide to open its breaker. Mr. Ocampo confirmed affirmatively. He highlighted that the intent of the proposed revision is for the TPs to provide the status of the relevant generator circuit breaker and to declare its offer whether it is zero or derated.

In terms of providing Zero MW offers, Mr. Olmedo highlighted that it is not available for market offers and it is only valid for Generators that are submitting nominations. If the TP is not available for a certain hour or day, they leave the certain hours to be blank or they will not submit their offer for the entire day. For nominations, solar plants not operational at nighttime can nominate zero values.



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Mr. Morillos asked what the offer submission in the MMS would be if the Zero MW is not allowed. Mr. Olmedo responded that the TPs should update their offer to either cancel for the entire day or they do not have to submit any offer profile for the specific trading hour that they are not available.

With regards to NGCP's suggestion on prohibiting a TP with open breaker status from submitting offers, Mr. Olmedo said that submitting offers and optimization considering the real-time information are two different modules. The system is designed with separate inputs for commitment of offer and real-time data, then considering meshing the two separate inputs will entail a longer processing time.

Mr. Ocampo said that NGCP's comment on prohibiting act refers to the MMS. If it will be prohibited in terms of policy, requiring the TPs that they "shall revise" is a way of prohibition. Mr. Ermelindo R. Bugaoisan Jr. (NGCP) expressed that it can be done through rules if it requires massive changes to the MMS.

In line with NGCP's suggestion on requiring the ramp-rate submission of TPs to be consistent with their registered or certified ramp-rates, the Proponent inquired on how the MO utilizes the registered ramp-rate in the COC. Mr. Olmedo responded that the generators can submit between their registered minimum ramp-rate up to registered maximum ramp-rate. The maximum ramp up-rate and maximum ramp down rate are the basis of MO for the registered maximum ramp-rate while the minimum registered ramp-rate, currently, is based on the lowest numerical value can be inputted in the MMS which is 0.1MW per minute.

Mr. Orillaza asked the MO on what will be considered in the MMS and MDOM if there is conflict between the offered capacity and ramp-rate. Mr. Olmedo expressed that the WESM Rules Clause 3.5.11.5 (b) should not be included since it is part of the scheduling process. He added that the ramp-rate can be revised between the ranges mentioned.

Mr. Banzon agreed to Mr. Olmedo's comment on the WESM Rules Clause 3.5.11.5 (b). He emphasized that having a fixed ramp-rate can defeat the technical constraints (i.e., for the dams with irrigation requirement) of the generating units.

As response, Mr. Ocampo said that intent of the proposed provision is for the ECO to monitor the ramp-rate. Ms. Gubaton-Lopez added that the intention is to reflect the TPs capacity in revising the offer, and to set parameters on flagging on the unusual use of the ramp-rate.

### 3. Definition of Availability

Mr. Ocampo said that the Proponent withdrew its proposal on the definition of "Availability."

### 4. Definition of Maximum Available Capacity





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Mr. Ocampo highlighted that the market has a different appreciation of Maximum Available Capacity compared to the definition on PGC which defined as the sum of the available capacity of the generating units.

In line with Mr. Ocampo's statement, Mr. Orillaza suggested using the "Available Capacity" instead the term "Maximum Available Capacity" so that it can easily be understood by the stakeholders. Ms. Javier suggested checking if there are other provisions wherein the term "Maximum Available Capacity" are used that can be affected if the word "Maximum" is omitted.

Noting the comments from Mr. Orillaza and Ms. Javier, Mr. Ocampo agreed to check other market documents.

### 5. Definition of Technical Constraint

Mr. Ocampo said that the Proponent is amenable in deleting the "constraints" on the proposed definition and in using "Generator Technical Constraint" to be more specific since the term "Technical Constraint" has a broad definition.

### 6. For the proposed amendments to the Dispatch Protocol Manual

Mr. Ocampo presented the comments received on the proposed revisions of the DP Manual which will be harmonized to the agreements on the WESM Rules

#### 3.3 Agreement:

1. The body agreed that the proposed amendment should be limited to compliance in view of finding solution and connection on the effect to the market.
2. As suggested by Mr. Leynes, the Proponent to revisit provisions wherein it is possible to add criteria or conditions for opening the breaker.
3. The Proponent will coordinate with the RCC Secretariat to align other provisions with the agreements of the RCC (i.e. global changes on the terms).

### 4.0 Adjournment

The meeting was adjourned at 12:21 PM.

Prepared by:

(signed)  
 MARY ROSE L. BISNAR  
 Rules Review Sr. Analyst  
 Market Assessment Group

Reviewed by:

(signed)  
 KAREN A. VARQUEZ  
 Senior Manager, Rules Review Division  
 Market Assessment Group



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Noted by:

(signed)  
 BIENVENIDO C. MENDOZA, JR.  
 Chief Market Assessment Officer

Approved by:

(signed)  
 JESUSITO G. MORALLOS  
 Chairperson, Independent

(signed)  
 JOSE RODERICK F. FERNANDO  
 Member, Independent

(signed)  
 RACHEL ANGELA P. ANOSAN  
 Member, Independent

(signed)  
 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)  
 (Attended by Mr. Jessie B. Victorio)  
 CARLITO C. CLAUDIO  
 Member, Generation Sector  
 Millennium Energy, Inc. / Panasia Energy, Inc.  
 (MEI/PEI)

(signed)  
 (Attended by Ms. Michelle S. Tuazon)  
 MARK D. HABANA  
 Member, Generation Sector  
 Vivant Corporation – Philippines (Vivant)

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

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

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

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

(signed)  
GIAN KARLA C. GUTIERREZ  
Member, Supply Sector  
First Gen Corporation (FGen)

(signed)  
(Attended by Mr. Kristoffer Monico S. Ng)  
JOHN PAUL S. GRAYDA  
Member, Market Operator  
Independent Electricity Market Operator of the  
Philippines (IEMOP)

(signed)  
DARRYL LON A. ORTIZ  
Member, System Operator  
National Grid Corporation of the Philippines  
(NGCP)

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Annex A - Matrix of Proposed Amendments to the WESM Rules

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed wording based on Re-comments	Proponent’s Response	RCC Caucus Agreement
<p><b>General Comments:</b></p> <p><b>TECHNICAL COMMITTEE (TC):</b></p> <p>The Technical Committee prepared a separate document (see Annex A) to clarify its position on the matter which would not have been reflected in the RCC-prescribed form, for the RCC’s consideration. Nevertheless, the TC provide its general comments as follows:</p> <p>1. Based on the understanding of the TC, the issue is regarding loopholes in the Must-Offer Rule (MOR) wherein Trading Participants offer in the WESM without clear intention of generating energy for the grid by (a) opening the breaker so that no schedule will be given or (b) submit very low ramp-rates as would render it impossible for the generating units or plants to attain the offered capacity (i.e., self-imposed scheduling constraint). <b>These allow the participants to circumvent the dispatch scheduling process without breaching the MOR (i.e., withholding of capacity).</b></p> <p>The <b>TC suggests citing the undesirable impacts in the market to demonstrate the gravity of such actions. Examples</b> of undesirable impacts would be <b>frequent pricing errors, extreme price volatility, or sub-optimal dispatch</b>. Price volatility and pricing errors can be observed and measured readily unlike actions relating to</p>						<p><b>Proponent’s Response:</b></p>		

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Annex A - Matrix of Proposed Amendments to the WESM Rules

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed wording based on Comments	Re-on Proponent’s Response	RCC Caucus Agreement
<p>circumvention of MOR which require more detailed investigations. Measurement allows quantitative comparison of market outcomes with introduction of revised rules and procedures.</p> <p>2. Based on the TC’s understanding, the amendment aims to provide clarity and guidance to Trading Participants in the submission and revision of generation offers in the market. The <b>TC suggests adding the reduction of undesirable market outcomes (e.g., frequent pricing errors, extreme price volatility, or sub-optimal dispatch) to the purpose of the proposed amendment.</b></p> <p>3. It was concluded in the proposed amendment that, if adopted, “will improve the compliance of the Trading Participants with MOR by being more responsible in offering/bidding and revising/updating of offers”. However, the TC does not share these views for the following reasons:</p> <ul style="list-style-type: none"><li>Trading Participants who are circumventing the MOR have demonstrated advanced knowledge and skills in the submission/revision of offers. Providing clarifications and guidelines will do very little to improve compliance because there is no breach or non-compliance in the first place.</li><li>The loopholes that are being exploited by Trading Participants are systemic or inherent in the market design and hence should be deterred accordingly. Defining “Maximum Available Capacity” is a good start but the proposed amendment fell short of the consistent contextual use of this term vis-à-vis “Registered Capacity”.</li></ul>								

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Annex A - Matrix of Proposed Amendments to the WESM Rules

WESM Rules								
Title	Clause	Provision	Proposed Amendment	Rationale	Comments	Proposed wording based on Comments	Re-on Proponent’s Response	RCC Caucus Agreement
4. Ramp rate nomination shall be based on the registered ramp rate if the intention really is to offer the maximum available capacity rate to avoid circumvention.								
<b>NGCP:</b>  1. To avoid artificial supply, it must be ensured that the undispatched Reserve Schedule (contracted in the absence of the Reserve Market) is not used for the Genco’s BCQ. 2. A system for offer validation must be put in place to determine any significant deviation from historical or normal ramping rates. It may be a soft warning prompt which can enable the TP to include in its submission its explanation to such deviation. 3. NGCP agrees with the amendment regarding the revision of Maximum Available Capacity prior to gate closure as long as the following should be observed: a) When the breaker is at OPENED position – it should be supported with valid reasons and not just to avoid possible breach of the MUST OFFER RULE. b) Also, same with the declaration of ramp rate – this should be based on the actual ramp rate and not artificial ramp rate, as what was being allowed by the rules. No need for TPs to offer with very low ramp rate since they are now allowed to submit revised capacity prior to gate closure subject for validation.								



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Generation Offers and Data	3.5.5.1	Each <i>Generation Company</i> including <i>Generation Companies</i> with <i>bilateral contracts</i> shall submit a standing <i>market offer</i> for each of its <i>scheduled generating units, battery energy storage systems and pumped-storage units</i> for each <i>dispatch interval</i> in each <i>trading day</i> of the week in accordance with the <i>timetable</i> . The standing <i>market offer</i>	Each <i>Generation Company</i> including <i>Generation Companies</i> with <i>bilateral contracts</i> shall submit a standing <i>market offer</i> <b><u>equivalent to the registered capacity or maximum available capacity,</u></b> for each of its <i>scheduled generating units, battery energy storage systems, and pumped-storage units</i> for each <i>dispatch interval</i> in each <i>trading day</i> of the week in accordance with the <i>timetable</i> . The standing <i>market offer</i> shall apply until revised or updated by the <i>Generation Company</i> .	<ul style="list-style-type: none"><li>The <i>Generation Companies</i> shall consider the “possible constraints”, as defined in the maximum available capacity, in submitting a standing market offer.</li><li>To make sure that the offers in the market are readily available and TPs can provide.</li></ul>	<b>TC:</b>  The PGC definition of “ <b>Capability and Availability Declarations</b> ” as stated below implies that the data submissions of Generators require declaration of availability and capability for day-ahead dispatch scheduling.  “ <b>Capability and Availability Declarations</b> ” - Refers to the data submitted by the Generation Company for its Scheduled Generating Unit, which is used by the			<b>TC:</b>  We acknowledged TC’s suggestion in defining the <b>Capability and Availability Declarations</b> , however, Trading participant's responsibilities in submitting offer data were already in the WESM Rules 3.5.5.1  Also, submission of plant offers implies declaration of availability and capability to run.

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		shall apply until revised or updated by the <i>Generation Company</i> .			<p>Market Operator in preparing the day-ahead Dispatch Schedule. It includes declaration of capability and Availability, Generation Scheduling and Dispatch Parameters, and Price Data.”</p> <p>This was not defined nor required in the proposed amendment.</p> <p>The TC suggest using this requirement in the proposed amendment and market the declarations binding</p>			

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					up to the real-time dispatch.			

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				<p><b>NGCP:</b></p> <p>Agree. Proposing that the Generation Company shall be required to include in its standing and revised offers the reason in case wherein the Maximum Available Capacity is less than the Registered Capacity.</p> <p>For Clarification: Would a BESS and a pumped storage generator be required to offer its capacity while charging batteries or pumping energy for storage in upper reservoir? Are they allowed to offer negative quantities? How much negative quantities are they allowed to offer at the minimum? There ought to be rules for ancillary</p>	<p><b>NGCP:</b></p> <p>Each <i>Generation Company</i> including <i>Generation Companies</i> with <i>bilateral contracts</i> shall submit a standing <i>market offer</i> <b><u>equivalent to the registered capacity or maximum available capacity</u></b>, for each of its <i>scheduled generating units, battery energy storage systems, and pumped-storage units</i> for each <i>dispatch interval</i> in each <i>trading day</i> of the week in accordance with the <i>timetable</i>. <b><u>If the submitted offer reflects a capacity that is less than the registered capacity, the Generation Company shall include the reason for such in its standing offer</u></b>. The standing <i>market offer</i> shall apply</p>	<p><b>NGCP:</b></p> <p>Suggest retaining the proposed wordings of MSC/CC.</p> <p>NGCP’s proposed additional wordings are already specified in DP 6.1.8.</p> <p>We would also like to propose revised wordings on DP 6.1.8 to provide more clarity.</p> <p>6.1.8 Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i>, or submit <i>bids</i> or <i>offers</i> <b><u>less than the registered capacity or maximum available capacity of their facility or generating unit</u></b> are required to provide <b><u>information on the justifiable</u></b> reasons or circumstances of such cancellation or submission.</p> <p>Response to NGCP’s for Clarification:</p>	
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					services must offer well. vis-a-vis rule as	until revised or updated by the <i>Generation Company</i> .  <b>Appendix A1.1 Generation Offers</b>  <u>(f) (new) Reasons or circumstances whenever the submitted market bids or market offers are cancelled or are less than the registered capacity of its facility or generating unit.</u>	<ol style="list-style-type: none"><li>1. BESS can offer quantity and price while charging. For pump storage, they can nominate quantity while pumping energy storage in upper reservoir.</li><li>2. [for BESS] Yes, they can offer negative quantities and prices (WR A1.4)</li><li>3. [for BESS] Offer shall be for a minimum block size of 1 MW</li></ol>	
Revision of Market Offers/Bids,	3.5.11.1	Each <i>Trading Participant</i> which has	Each <i>Trading Participant</i> which has submitted standing	<ul style="list-style-type: none"><li>• To ensure that the revised/updated market offer reflects</li></ul>	<u>NGCP</u>  Agree		See proposed revised wordings:	Adopt proponent's

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Nomination of Loading Levels, and Projected Outputs		submitted standing offers or bids for each of its <i>scheduled generating unit, battery energy storage system and pumped-storage unit</i> may revise any of its <i>market offers</i> or <i>market bids</i> for any <i>dispatch interval</i> in any trading day of the current week-ahead <i>market horizon</i> in accordance with the <i>timetable</i> , and subject to Clause 3.5.11.4 and each revised <i>market</i>	<i>offers or bids for each of its scheduled generating unit, battery energy storage system, and pumped-storage unit</i> may revise any of its <i>market offers</i> or <i>market bids</i> <b><u>equivalent to the maximum available capacity and shall take into account the conditions under Clause 3.5.11.5 and Clause 3.5.11.6,</u></b> for any <i>dispatch interval</i> in any trading day of the current week-ahead <i>market horizon</i> . <b><u>Each revised market offer or market bid shall be submitted</u></b> in accordance with the <i>timetable</i> , and subject to Clause 3.5.11.4, and	<div>the TP’s readily available capacity.</div> <div>• TPs to consider the conditions mentioned in 3.5.11.6 in revising/updating offers.</div>			Each <i>Trading Participant</i> which has submitted standing <i>offers</i> or bids for each of its <i>scheduled generating unit, battery energy storage system, and pumped-storage unit</i> may revise any of its <i>market offers</i> or <i>market bids</i> <b><u>equivalent to the maximum available capacity and shall take into account the conditions under Clause 3.5.11.5 and Clause 3.5.11.6,</u></b> for any <i>dispatch interval</i> in any trading day of the current week-ahead <i>market horizon</i> . <b><u>Each revised market offer or market bid shall be submitted</u></b> in accordance with the <i>timetable</i> , and subject to Clause 3.5.11.4, and each revised <i>market offer</i> or <i>market bid</i> submitted shall provide the <b><u>contain all the</u></b>	further revision



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		<i>offer or market bid</i> submitted shall provide the information set out in Appendix A1.	<del>each revised market offer or market bid submitted shall provide the</del> <b>contain</b> information set out in Appendix A1.				information set out in Appendix A1.	
Revision of Market Offers/Bids, Nomination of Loading Levels, and Projected Outputs	3.5.11.5	<i>Market bids or market offers</i> for any <i>dispatch interval</i> may be revised by <i>Trading Participants</i> prior to gate closure if they no longer represent a reasonable estimate of: (a) the expected availability of the relevant <i>generating unit</i>	<i>Market bids or market offers</i> for any <del><i>dispatch interval</i></del> may <b>shall</b> be revised by <i>Trading Participants</i> prior to gate closure <b>in accordance with the timetable</b> if they no longer represent a reasonable estimate of: (a) the expected <i>availability</i> of the relevant <i>generating unit</i> <b>(e.g., plant</b>	<ul style="list-style-type: none"><li>Requires TP to revise their offers if it does not represent a reasonable estimate its maximum available capacity</li><li>Provided conditions to be taken in revising/updating offers</li><li>Revising/updating market bids shall be within the WESM</li></ul>	<b>TC:</b> <ul style="list-style-type: none"><li>Failure to revise is waiving a privilege and therefore revision is not required. Therefore, “...may be revised...” should be retained.</li><li>Do we really use “plant breaker”? Shall we maintain “circuit breaker”?</li></ul>		<b>TC:</b> <ul style="list-style-type: none"><li>The intention of the revision is to compel participants to revise if their offers do not reflect the provisions stated. Suggest retaining “shall”.</li><li>We proposed to revise “plant breaker” to “generator breaker” to be consistent with RSDCP 2.5.4.7.</li></ul>	Adopt proponent’s revisions; use “generator <b>circuit</b> breaker” for item (a); adopt revised item (b)

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		or <i>scheduled load</i> for that <i>dispatch interval</i> ; or (b) the <i>demand bids</i> or <i>offers</i> likely to apply for the real-time optimization of that <i>dispatch interval</i> .	<u><b>breaker status, outage)</b></u> or <i>scheduled load</i> for that <i>dispatch interval</i> <u><b>in relation to its status, such as but not limited to, plant breaker status or commitment state;</b></u> or (b) <u><b>the attainable capacity as may be affected by the ramp rate limitations encountered or likely to be encountered by the</b></u>	timetable (Reference of timetable: DPM Sec. 4)  • Insertion of “shall” to harmonize with DP 6.1.7 and require the TPs to revise the offers if it does not represent a reasonable estimate	<ul style="list-style-type: none"><li>Do we accommodate “likely to be encountered”? We may turn-off or adjust projection based on performance parameters instead of the “likelihood to encounter” limitations.</li><li>We suggest that the MO revisit the criteria on bid nomination of generators which are not on outage, but the breaker is open.</li><li>Available capacity nomination shall be based on the</li></ul>			<ul style="list-style-type: none"><li>See proposed revised wordings.  <i>Market bids or market offers</i> for any <i>dispatch interval</i> <del>may</del> <u><b>shall</b></u> be revised by <i>Trading Participants</i> prior to gate closure <u><b>in accordance with the timetable</b></u> if they <u><b>these offers</b></u> no longer represent a reasonable estimate of: (a) the <del>expected</del> <u><b>availability status</b></u> of the relevant generating unit <u><b>(e.g., generator breaker status, outage)</b></u> or <u><b>scheduled load</b></u> for that <i>dispatch interval</i>; or (b) <u><b>the capacity that can be attained taking into account the ramp rate limitations of the generating</b></u></li></ul>

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			<p><u>generating unit during the relevant dispatch interval; or</u></p> <p>(c) the <i>demand bids</i> or <i>offers</i> likely to apply for the real-time <i>dispatch</i> optimization of that <i>dispatch interval</i>.</p>		<p>maximum capacity and the ramp rates shall be based on the registered ramp rates as certified by SO.</p>		<p><u>unit during the relevant dispatch interval; or</u></p> <p>(c) the <i>demand bids</i> or <i>offers</i> likely to apply for the real-time <i>dispatch</i> optimization of that <i>dispatch interval</i>.</p> <ul style="list-style-type: none"><li>The Registration Manual provides an option for TPs to choose if the availability of the generating unit shall be based on real-time status of the breaker or its market offers.</li></ul> <p>(from RSDCP Manual)</p> <p><b>2.5.4.7 Modelling of Generating Unit’s Availability</b></p>	

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							<p>Upon registration, <i>Trading Participants</i> shall specify if the availability of its <i>generating unit</i> shall be based on the real-time status of its generator breaker, or on the availability of its <i>market offers</i>.</p> <p>Requesting additional inputs from MO.</p> <ul style="list-style-type: none"><li>• Agree.</li></ul>	
					<u>AC Energy:</u>  We agree with the MSC enforcing that		<u>AC Energy:</u>  No definition of reasonable estimate. This is based on	

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					plant breakers should be closed unless a plant is on outage/emergency to ensure compliance to the Must-Offer Rule.  How does the MSC define a reasonable estimate of its maximum available capacity?  Can the MSC provide clarification on 3.5.11.5 (b)? How will the MSC determine if a ramp rate does not meet their qualifications? This is a significant change since ramp rates are an integral		trading participants which will be subject to the assessment and further verification during the compliance monitoring.	

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					<p>part of the strategies for high-cost fuel plants like diesels especially in the conditions set by the 5-minute market. Besides financial reasons, ramp rates can also be utilized in such a way that it forces a diesel plant to rest for a certain period that is essential for the overall plant health.</p> <p>Maybe the MSC can provide conditions or qualifiers that can be used by the trading participants to adhere to rules while also being able to strategize in the market.</p>			



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					<u>Aboitiz Power:</u>  We suggest that the word “commitment state” should be defined.  In Unit Commitment solution in power system analysis, the commitment status of a generating unit represents the status of the said generating unit with respect to the previous operating period.		<u>Aboitiz:</u>  See responses to TC.	
					<u>NGCP:</u>		<u>NGCP:</u>	

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					<p>Proposing to include consideration for target startup and shutdown</p> <p>Also, NGCP agrees that there is a need to require the Trading Participants to revise/update their bids or offers if there are changes in the breaker status or the offer cannot be reached with the ramp rate limitations. However, we would like to suggest a further improvement of the process by:</p> <p>1. Prohibiting a Trading Participant with open</p>		<p>The startup/shutdown is already being considered by ECO in assessing MOR.</p> <p>1. See responses to 3.5.5.1.</p> <p>Such configuration would require a significant change in the MMS. Circuit breaker status is a real-time data that is read by the system. Barring the offers/nomination at the onset of trading activity may affect other process/es within the MMS. - For confirmation and further comments of the Market Operator.</p> <p>In addition, the proposal prohibiting a Trading Participant with open breaker status from submitting offers this</p>	

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					<p>breaker status from submitting offers.</p> <p>2. Requiring the ramp- rate submissions of Trading Participants to be consistent with their registered or certified ramp-rates.</p> <p>This would ensure that the Trading Participants with open breaker status will not be able to submit offers entirely, and that no schedules will be given for them. As for the ramp-rates,</p>		<p>proposal may entail system enhancement on NMMS and may have an additional cost.</p> <p>2. This is the current process.</p> <p>We would like to request additional input from the Market Operator.</p> <p>MAG: Request inputs from TPs re: ramp rates in COC vs offered ramp rates</p>	

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					the submission of ramp-rates consistent with the certified or registered values will ensure that the maximum available capacity is attainable and will be meet by the Trading Participant should they be scheduled.			
Glossary	(new)	(Definition from Dispatch Protocol Manual)  <b>Availability.</b> The duration of time over a specified period that a plant/unit is ready to be in service or operational.	<del><b>Availability. The duration of time over specified period that a plant is ready to be in service or operational</b></del> <b>state of readiness of a generating unit or facility for actual use, operation, or service for a particular time, period, or dispatch interval.</b>	<ul style="list-style-type: none"><li>Added to provide clarity on the intent of availability mentioned in 3.5.11.5, that the plant is ready to provide service.</li><li>Transferred the definition from Dispatch Protocol Manual since this was already</li></ul>	<b>TC:</b>  “Availability” is a reserved word in the electricity industry as a reliability metric, which is defined in the Philippine Grid Code (PGC) as:  “The long-term average fraction of time that a		<b><u>TC/MERALCO/NGCP:</u></b>  Retaining the original definition of Availability.  Note: Changing the definition becomes moot, anyway, because the term “availability” in the proposed revision to Clause 3.5.11.5 (a) was replaced by another term, i.e., <i>status</i> – a term that	Adopt original definition; concur with proponent

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				introduced in the WESM Rules	Component or system is in service and satisfactorily performing its intended function. Also, the steady-state probability that a Component or system is in service.”		is also defined in the WESM Rules.	
					TC suggests not to use this term since their definitions are very different.			
					<u>MERALCO:</u>  How shall availability be measured or quantified given this proposed definition?			
					<u>NGCP:</u>  Note, however, that the PGC 2016 defines	<u>NGCP:</u>  <b>Availability.</b> The duration of time over a		

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					“Availability” as “The long-term average fraction of time that a Component or system is in service and satisfactorily performing its intended function. Also, the steady-state probability that a Component or system is in service.” This definition refers not only to generating units but also to other grid components.	specified period that a plant/ <b>generating</b> unit is ready to be in service or operational.		
Glossary	(new)	(Definition from Dispatch Protocol Manual)  Maximum available capacity. Equal	<u>Maximum available capacity. Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit outages, scheduled unit outages, de-</u>	<ul style="list-style-type: none"><li>Transferred the definition from Dispatch Protocol Manual since this was already introduced in the WESM Rules</li></ul>	<u>TC:</u>  The definition of the Maximum Available Capacity in the PGC is recommended, as follows:		<u>TC:</u>  For Maximum Available Capacity:  We need to use the maximum available capacity of a single unit and not the sum of all units in a plant since we	Adopt as further revised; Global change of “maximum available capacity” to



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		to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit outages, scheduled unit outages, de-rated capacity due to <i>technical constraints</i> and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the <i>grid</i> . For co-generation systems, the <i>maximum available capacity</i> is	<u>rated capacity technical constraints and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the grid.</u> <del><u>For co-generation systems, the maximum available capacity is further determined by taking into account the equivalent power of the thermal energy extraction by the energy host and technical constraints.</u></del>	<ul style="list-style-type: none"><li>Previous definition includes the condition for co-generation systems. Proposed to delete since this condition is already specified in the definition of technical constraints including other conditions plant types.</li></ul>	<p>“<b>Maximum Available Capacity</b> - The sum of the Available Capacity/ies of the Generating Units of the Generating Plant.”</p> <p>In addition, the TC provides the following suggestions on how the definitions may improve the proposed amendment:</p> <ul style="list-style-type: none"><li><b>Registered Capacity</b> should be defined as the tested/certified MW capacity on the COC of the</li></ul>			check compliance per resource_id per interval.  We understand TC’s comments to harmonize the terms with the PGC, however, the use of “maximum available capacity” in WESM has different applications.  We proposed the revised wordings below:  <u><b>Maximum available capacity. Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit outages, scheduled unit outages, de-rated capacity generator technical constraints and weather disturbance that</b></u>	“available capacity”; <u><b>de-rated capacity</b></u> to “derating capacity”

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		further determined by taking into account the equivalent power of the thermal <i>energy</i> extraction by the <i>energy</i> host and <i>technical constraints</i> .			<p>Generator, or the most recent capacity test result authorized by the ERC.</p> <ul style="list-style-type: none"><li>• <b>Maximum Capacity</b> should be defined as the maximum <u>gross</u> MW output of generating unit or plant according to the Registered Capacity. (Assumed: gross)</li><li>• <b>Pmax</b> should be defined as the Maximum Capacity of generating unit or plant less</li></ul>		<p><u><b>cause damage to the unit or that would otherwise limit its ability to inject power to the grid.</b></u> <del><b>For co-generation systems, the maximum available capacity is further determined by taking into account the equivalent power of the thermal energy extraction by the energy host and technical constraints.</b></del></p> <p>For Pmax:</p> <ul style="list-style-type: none"><li>• To clarify, we are not proposing to amend the definition of Pmax in the proposal</li></ul>	

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					<p>demand for station service and auxiliaries. Note: Pmax is reckoned at the Market Trading Node for purposes of offer submission.</p> <p>Gross Maximum Capacity and Net Maximum Capacity need not be mentioned in the amendment.</p>		<p>Pmax is the basis of MO in the market registration data which should be the same as registered capacity. Sometimes, the gross capacity is used in Pmax/Reg Cap</p> <p>Note: May request the opinion of MO since they know better what is utilized in the COC provided by ERC</p>	
					<p><u>NGCP:</u></p> <p>Agree</p>			

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Glossary	(new)	(Definition from Dispatch Protocol Manual)  Technical Constraint. Refers to plant equipment-related failure, limitations encountered during start-up/shutdown procedure, effects of ambient temperature and resource-related constraints due to the following: (a) water elevation and diversion	<u>Technical Constraint. Refers to plant equipment related failure/constraints, limitations encountered during start up/shutdown procedure, effects of ambient temperature and resource-related constraints due to the following:</u>  <u>(a) water elevation and diversion requirements for domestic or irrigation use for hydro plants;</u>  <u>(b) steam quality (chemical) composition.</u>	• Transferred the definition from Dispatch Protocol Manual since this was already introduced in the WESM Rules	<u>TC:</u>  Why slash constraints with failure? Do they mean the same thing?  Nevertheless, Technical Constraint is a very broad phrase that can apply to the generation, transmission, and distribution sectors.  TC suggests omitting this term being exclusively defined for generation.		<u>TC:</u>  • Amenable in deleting the “constraints”.  • The definition of technical constraints is very straight-forward and only referring to the Generator. However, we are amenable to on using “Generator Technical Constraint”	Global change of “technical constraint” to “generator technical constraint”
					<u>Aboitiz Power:</u>	<u>Aboitiz Power:</u>	<u>Aboitiz:</u>	

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		requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and (d) steam flow	<u><b>condensable and non-condensable gases, steam pressure and temperature) for geothermal plants;</b></u>  <u><b>(c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and</b></u>  <u><b>(d) steam flow limitations, station load, and electricity demand of its energy host, in the case of the co-generation systems.</b></u>		We suggest to improve the definition of technical constraint given that the maximum available capacity of a unit may be affected by other instances or circumstances which are not within the ambit of the specific cases in the defined provision of technical constraint.	Technical Constraint. Refers to plant equipment related failure/constraints, limitations encountered during start up/shutdown procedure, effects of ambient temperature and resource-related constraints due to the following:  (a) water elevation and diversion requirements for domestic or irrigation use for hydro plants;  (b) steam quality (chemical composition, condensable and	The definition of technical constraints is very straightforward. The proposed additional wordings, as in (e), are not specific and may be misused to justify actions due to the generality of the statement.  We suggest to adopt the revised wordings below:  <u><b>Generator Technical Constraint. Refers to plant equipment related failure/constraints, limitations encountered during start up/shutdown procedure, effects of ambient temperature and resource-related</b></u>	

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		limitations, station <i>load</i> , and electricity demand of its <i>energy</i> host, in the case of the co-generation systems.				non-condensable gases, steam pressure and temperature) for geothermal plants;  (c) unavailability of fuel resources that are not within the control of the Generation Company for biomass power plants; <b><u>and</u></b>  (d) steam flow limitations, station load, and electricity demand of its energy host, in the case of the co-generation systems; <b><u>or</u></b>  <b><u>(e) any analogous circumstances</u></b>	<b><u>constraints due to the following:</u></b>  <b><u>(a) water elevation and diversion requirements for domestic or irrigation use for hydro plants;</u></b>  <b><u>(b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants;</u></b>  <b><u>(c) unavailability of fuel resources that are not within the control of the Generation Company for biomass power plants; and</u></b>  <b><u>(d) steam flow limitations, station load,</u></b>	

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						<u>which are not within the control of the Generation Company.</u>	<u>and electricity demand of its energy host, in the case of the co-generation systems.</u>	
					<u>AC Energy:</u>  Are ramp rates now considered a technical constraint?		<u>AC Energy:</u>  Not specifically in the definition of technical constraints, but ramp rates are being considered in the proposal in revising offers.	
					<u>NGCP:</u>  Agree.  Further, NGCP suggests to omit “constraints” since	<u>NGCP:</u>  <u>Technical Constraint. Refers to plant equipment related failure/limitations encountered during</u>	<u>NGCP:</u>  Amenable with the suggestion and to use the term “Generator Technical Constraint”	

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					this is synonymous to “limitations”.	<u>start up/shutdown procedure, effects of ambient temperature and resource-related constraints due to the following:</u>		

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General Comments:						Proponent’s Response:			
<u>TECHNICAL COMMITTEE (TC):</u>									
1. The TC believes that the terms used in the dispatch protocol should have the same meaning and context with that of the Philippine Grid Code (PGC) since this is the primary reference of the System Operator (SO), and the document is a protocol									



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<p>between the Market Operator (MO) and SO in providing services to the Trading Participants. See previous comments and suggestions in the matrix on how the definitions may improve the proposed amendment.</p> <p>2. The aim of the proposed amendment to provide clarity and guidance to Trading Participant in the submission and revision of Generation Offers in the WESM will be ideal in understanding the dispatch protocol. However, the view of the TC is that there are bigger issues that need to be addressed in the WESM design to avoid the exploitation of loopholes and encourage greater responsibility and accountability of trading participants. The TC recommends a market design study on net pool and net settlement with advanced (day-ahead) scheduling of capacities with bilateral contracts.</p> <p>3. Behaviors or actions of trading participants in the context of this proposed amendment would be difficult to observe or measure. This is more challenging if non-compliance or breach cannot be established. The TC suggests monitoring of undesirable market results or event which can be readily observed, measured, and correlated with participant actions or behaviors (e.g., pricing errors or spot price volatility). This approach can help justify the necessity of the proposed amendment and later quantify improvements in market performance with its implementation.</p>									
BIDS, OFFERS AND DATA SUBMISSION AND PROCESSING	Background	6.1.7 WESM Rules Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or	6.1.7 WESM Rules Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer	• To include other conditions in revising offers and cite samples	AC Energy:  Same comments from the 3.5.11.5 revision		AC Energy:  See responses in 3.5.11.5.	Harmonize with agreements in corresponding provision in WESM Rules	

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		<i>offers</i> if they no longer represent a reasonable estimate of either the expected <i>availability</i> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or <i>scheduled load</i> or the <i>demand bids</i> or <i>offers</i> likely to apply in the <i>real-time dispatch optimization</i> for the <i>dispatch interval</i> .	represent a reasonable estimate of either the expected <u><b>status and availability (e.g., plant breaker status, outage)</b></u> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> , <u><b>ramp rate limitations from the plant statuses in attaining the market bids or market offers</b></u> , or <i>scheduled load</i> or the <i>demand bids</i> or <i>offers</i> likely to apply in the <i>real-time dispatch optimization</i> for the <i>dispatch interval</i> .	<ul style="list-style-type: none"><li>To harmonize with the proposed amendment in WESM Rules Clause 3.5.11.5</li></ul>	<b>NGCP:</b>  For consistency with the aforementioned proposal  NGCP also agrees that there is a need to require the Trading Participants to revise/update their offers, if there are changes in the breaker status or the offer cannot be reached with the ramp rate limitations. However, we would like to suggest a further improvement of the process by:	<b>NGCP:</b>  6.1.7 WESM Rules Clause 3.5.11.5 requires <i>Trading Participants</i> to revise their <i>bids</i> or <i>offers</i> if they no longer represent a reasonable estimate of either the expected <u><b>status and availability considering generator technical constraints (e.g., generator breaker status, outage, startup and shutdown procedures)</b></u> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> , <u><b>ramp rate limitations</b></u>	<b>NGCP:</b>  See responses in 3.5.5.1	

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					<p>1. Prohibiting a Trading Participant with open breaker status from submitting offers.</p> <p>2. Requiring the ramp-rate submissions of Trading Participants to be consistent with their registered or certified ramp-rates.</p> <p>This would ensure that the Trading Participants with open breaker status will not be able to submit offers entirely, and that no schedules will be given for them. As for the ramp-rates, the submission of ramp-rates consistent with the certified or registered values will ensure that the maximum available capacity is attainable and will be meet by the Trading Participant</p>	<p><u>from the plant statuses in attaining the market bids or market offers,</u> or <i>scheduled load</i> or the <i>demand bids</i> or <i>offers</i> likely to apply in the <i>real-time dispatch</i> optimization for the <i>dispatch interval</i>.</p>		

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					should they be scheduled.			
BIDS, OFFERS AND DATA SUBMISSION AND PROCESSING	Background	6.1.8 Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i> , or submit <i>bids</i> or <i>offers</i> less than the registered capacity or <i>maximum available capacity</i> of their <i>facility</i> or <i>generating unit</i> are required to provide information on the reasons or circumstances of	6.1.8 Pursuant to <i>WESM Rules</i> Clause 3.5.11.6, <i>Trading Participants</i> that cancel their <i>bids</i> or <i>offers</i> , or submit <i>bids</i> or <i>offers</i> less than the registered capacity <del>or <i>maximum available capacity</i></del> of their <i>facility</i> or <i>generating unit</i> are required to provide information on the reasons or circumstances of such cancellation or submission.	<ul style="list-style-type: none"><li>Trading Participants who cancel their <i>bids/offers</i> or submit <i>bids</i> or <i>offers</i> less than the registered capacity, shall provide reasons or justifications.</li><li>To harmonize with <i>WESM Rules</i> Clause 3.5.11.6</li></ul>	<u>NGCP:</u>  Agree.  Proposing to include in Section 6.9.2	<u>NGCP:</u>  <b><u>(f) (new) Reasons or circumstances whenever the submitted market bids or market offers are cancelled or are less than the registered capacity of its facility or generating unit.</u></b>	<b><u>NGCP:</u></b>  See responses in 3.5.5.1	For revision considering NGCP’s suggestion (same with agreement in WESM Rules)

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		such cancellation or submission.						
BIDS, OFFERS AND DATA SUBMISSION AND PROCESSING	Revisions of Self-scheduled Nominations, Bids and Offers Based on Reasonable Estimates	6.13 <i>Trading Participants</i> shall revise their <i>self-scheduled nominations, bids, or offers</i> , if the <i>self-scheduled nominations, bids or offers</i> submitted no longer represent a reasonable estimate of either the following:  a. The expected <i>availability</i> for the <i>dispatch interval</i> of the	6.13 <i>Trading Participants</i> shall revise their <i>self-scheduled nominations, bids, or offers</i> , if the <i>self-scheduled nominations, bids or offers</i> submitted no longer represent a reasonable estimate of either the following:  a. The expected <i>status</i> and <i>availability (e.g., plant breaker status, outage)</i> for the <i>dispatch interval</i> of the	<ul style="list-style-type: none"><li>To include other conditions in revising offers and cite samples</li><li>To harmonize with the proposed amendment in WESM Rules Clause 3.5.11.5</li></ul>	<b>NGCP:</b>  For consistency with the aforementioned proposal.  Also, NGCP agrees that there is a need to require the Trading Participants to revise/update their offers, if there are changes in the breaker status or the offer cannot be reached with the ramp rate limitations. However, we would like to suggest a further improvement of the process by:  1. Prohibiting a Trading Participant with open	<b>NGCP:</b>  6.13 <i>Trading Participants</i> shall revise their <i>self-scheduled nominations, bids, or offers</i> , if the <i>self-scheduled nominations, bids or offers</i> submitted no longer represent a reasonable estimate of either the following:  a. The expected <i>status</i> and <i>availability (e.g., plant breaker status, outage)</i> for the <i>dispatch interval</i> of the relevant <i>generating unit</i> or	<b>NGCP:</b>  See responses in 3.5.5.1	Harmonize with agreements on WESM Rules

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		relevant generating unit or scheduled load; or b. The loading level, projected output, bid or offer	relevant generating unit or scheduled load <u>in relation to its status, such as but not limited to, plant breaker status or commitment state</u> ; or b. <u>The attainable capacity as may be affected by the ramp rate limitations encountered or likely to be encountered by the generating unit during</u>		breaker status from submitting offers. 2. Requiring the ramp-rate submissions of Trading Participants to be consistent with their registered or certified ramp-rates.  This would ensure that the Trading Participants with open breaker status will not be able to submit offers entirely, and that no schedules will be given for them. As for the ramp-rates, the submission of ramp-rates consistent with the certified or registered values will ensure that the maximum available capacity is attainable and will be meet by the Trading Participant	<u>scheduled load in relation to its status, such as but not limited to, plant breaker status, shutdown/startup procedures or commitment state</u> ; or b. <u>The attainable capacity as may be affected by the ramp rate limitations encountered or likely to be encountered by the generating unit during the relevant dispatch interval; or</u>  c. The loading level, projected output, bid or offer.		

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			<u>the relevant dispatch interval; or</u>  c. The <i>loading level, projected output, bid or offer.</i>		should they be scheduled.			
DEFINITIONS, REFERENCES AND INTERPRETATION	Definitions	2.1.2 The following words and phrases as used in this <i>Market Manual</i> shall have the following meaning:  a. Ancillary Service Procurement Agreement	2.1.2 The following words and phrases as used in this <i>Market Manual</i> shall have the following meaning:  a. Ancillary Service Procurement Agreement  b. Automatic Generation Control  c. Automatic Load Dropping (ALD)  <del>d. <b>Availability.</b> The duration of time over</del>	<ul style="list-style-type: none"><li>To refer the definition of terms to WESM Rules</li><li>Clerical enhancements</li></ul>	<u>NGCP:</u>  Noted but with proposed revision on the term.		<u><b>NGCP:</b></u>  See responses re: definition of availability	Harmonize with agreements on WESM Rules



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		b. Automatic Generation Control  c. Automatic Load Dropping (ALD)  d. <b>Availability.</b> The duration of time over a specified period that a plant/unit is ready to be in service or operational.  e. xxx  .  .  .  s. <b>Maximum available capacity.</b> Equal to the registered	<del>a specified period that a plant/unit is ready to be in service or operational.</del>  ed. Bid  fe. Capability  gf. Cascading Outages  hg. Contingency  ih. Contingency Reserve  ji. Demand Control  kj. Demand Control Imminent Warning  lk. Dispatchable Reserve  ml. Disturbance					



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		maximum capacity (Pmax) of the (aggregate) unit less forced unit <i>outages</i> , scheduled unit <i>outages</i> , de-rated capacity due to <i>technical constraints</i> and weather disturbance that cause damage to the unit or that would otherwise limit its ability to inject power to the <i>grid</i> . For co- <i>generation</i> systems, the <i>maximum available capacity</i> is further determined by taking into	<del>am.</del> Frequency control <del>en.</del> Generator <del>po.</del> Load shedding <del>ap.</del> Manual Load Dropping <del>rg.</del> Market Management System (MMS) <del>s.</del> <b>Maximum available capacity.</b> Equal to the registered maximum capacity (Pmax) of the (aggregate) unit less forced unit <i>outages</i> , scheduled unit <i>outages</i> , de-rated capacity due to <del>technical constraints</del> and weather disturbance that						

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		account the equivalent power of the thermal <i>energy</i> extraction by the <i>energy</i> host and <i>technical constraints</i> .  t. xxx  . . .  jj. <b>Technical Constraint.</b> Refers to plant equipment-related failure, limitations encountered during <i>start-up/shutdown</i> procedure, effects of ambient temperature and	<del>cause damage to the unit or that would otherwise limit its ability to inject power to the grid. For co-generation systems, the maximum available capacity is further determined by taking into account the equivalent power of the thermal energy extraction by the energy host and technical constraints.</del>  tr. MMS-Market Participant Interface (MPI)  us. Multiple Outage Contingency  vt. Offer  wu. Operating Margin					

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Annex B – Matrix of Proposed Amendments to Dispatch Protocol Manual Issue 16.0

WESM Manual on Dispatch Protocol Issue 16.0								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent’s Response	RCC Agreement
		resource-related <i>constraints</i> due to the following: (a) water elevation and diversion requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam pressure and temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the <i>Generation Company</i> for biomass power plants; and (d)	<del>xy.</del> Preferential Dispatch Units <del>yw.</del> Real-Time Data <del>zx.</del> Real-Time Dispatch <del>aa.y.</del> Red Alert <del>bb.z.</del> Regulating Reserve <del>cc.aa.</del> Security <del>dd.bb.</del> Self-scheduled nomination <del>ee.cc.</del> Shutdown <del>ff.dd.</del> Stability <del>gg.ee.</del> Start-up <del>hh.ff.</del> System Integrity Protection Scheme (SIPS)					

MEETING MINUTES

Subject/Purpose : 211<sup>th</sup> RCC (Caucus) Meeting No. 2023-04  
Date & Time : 10 March 2023, 9:00 AM to 3:00 PM  
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		steam flow limitations, station load, and electricity demand of its energy host, in the case of the co-generation systems.  kk. xxx  ll. xxx  mm. xxx	<del>igg.</del> System Operator System Advisories  <del>jj.</del> <b>Technical Constraint.</b> Refers to plant equipment-related failure, limitations encountered during start-up/shutdown procedure, effects of ambient temperature and resource-related constraints due to the following: (a) water elevation and diversion requirements for domestic or irrigation use for hydro plants; (b) steam quality (chemical composition, condensable and non-condensable gases, steam						

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			<p><del>pressure and temperature) for geothermal plants; (c) unavailability of fuel resources that are not within the control of the</del> <i>Generation Company</i> <del>for biomass power plants; and (d) steam flow limitations, station load, and electricity demand of its energy host, in the case of the co-generation systems.</del></p> <p><del>kk</del><u>hh</u>. Voltage Control</p> <p><del>l</del><u>ii</u>. Voltage Instability</p> <p><del>mm</del><u>jj</u>. Voltage Sag</p>						