



RULES CHANGE COMMITTEE

Proposed Amendments on WESM Manual on Dispatch Protocol on Issuance and Coverage of Dispatch Schedules below Minimum Stable Load

Effective Date : 13 March 2025

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WHEREAS, the PEM Board approved on 23 October 2024¹ RCC Resolution No. 2024-07 entitled “Proposed Urgent Amendments on WESM Manual on Dispatch Protocol (DPM) on Issuance and Coverage of Dispatch Schedules below Minimum Stable Load”, which sought to amend the DPM to:

- (i) provide guidance on instances where the generating unit is scheduled to operate below its minimum stable load or P_{min} , whether the generating unit is currently running or offline;
- (ii) emphasize the importance of following the System Operator’s re-dispatch instructions, when issued, to maintain the reliability and security of the grid;
- (iii) enable the System Operator to address the possible adverse impact of the non-compliance and correspondingly take necessary actions; and
- (iv) encourage Trading Participants to actively revisit and manage their offer submission to prevent recurrence of being scheduled below its generating unit’s minimum stable load;

WHEREAS, in accordance with the rules change process for urgent amendments², the revised market document was posted in the Governance Arm Website on 24 October 2024, with changes that are effective until six (6) months from the date of posting (i.e. from 25 October 2024 until 25 April 2025) or until the corresponding general amendment of the same matter is promulgated by the DOE, whichever is earlier;

WHEREAS, the rules change process for the corresponding general amendments was initiated with the posting of the proposal in the Governance Arm Website on 30 October 2024 to solicit comments from all WESM Members and all interested parties;

WHEREAS, following the 30-working day commenting period for the general amendment until 11 December 2024, comments were received from ACEN Corporation (ACEN), National Grid Corporation of the Philippines (NGCP), and WESM Market Surveillance Committee (MSC);

WHEREAS, during the 242nd RCC (Regular)³ Meeting on 17 January 2025, the Enforcement and Compliance Office (ECO) presented implementation updates of the urgent amendments that covers the November 2024 and December 2024 billing periods (26 October 2024 to 25 December 2024). During the covered period, the ECO monitored generator behavior and actions in response to real-time dispatch (RTD) schedules below minimum stable load or P_{min} ;

WHEREAS, with the foregoing observations, the ECO deemed that incorporating the new guidelines in the WESM Dispatch Protocol Manual is necessary, and that Trading Participants are capable of adhering to the said guidelines when they are scheduled below their P_{min} ;

WHEREAS, in view of the ECO’s updates, the RCC emphasized the necessity of communication between the Trading Participants and the System Operator regarding planned actions when generating units

¹ PEM Board Resolution No. 2024-77-05

² Rules Change Manual, Section 7.4

³ [RCC-MIN-2025-01](#)

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are scheduled below their minimum stable load or P_{min} . This communication is important for the System Operator to know the current grid status and take appropriate measures to maintain grid stability. It was also noted that prior notification to the System Operator is not required when units are scheduled above their P_{min} ;

WHEREAS, on the same meeting, the RCC deliberated the general amendment and adopted Section 11.4.4 of the DPM with further modifications on items (a)(i) and (b), with the latter's rewording decided by plurality voting and in consideration of the clarification that Trading Participants receive their RTD schedules in the Market Participant Interface (MPI) two (2) minutes before the start of the dispatch interval;

WHEREAS, during the 243rd RCC (Regular) Meeting on 21 February 2025, the Market Assessment Group (MAG) presented its report (See Annex B) regarding the implementation of the corresponding urgent amendments;

WHEREAS, on same meeting and report, MAG recommended:

- (i) RCC to request from the PEM Board the extension of effectivity of the urgent amendment in consideration of the current effectivity until 25 April 2025 and the time required for the approval of the corresponding general amendments; and
- (ii) ECO to continue its implementation of the urgent amendments relative to its monitoring of dispatch conformance;

WHEREAS, the RCC then further discussed and decided on the following:

- (i) The term "in service" be, 1) used in place of "running" in the proposed Section 11.4.4 (a)(i) of the DPM, in accordance with the definition of the term "in service" provided in IEEE Standard 762-2006 and its application in ERC Resolution No. 21, Series of 2016; and 2) defined and incorporated into Section 2.1 (Definitions) of the DPM;
- (ii) Further revisions to Section 11.4.4 (a) of the DPM on the proviso concerning the start-up and shutdown profile of generating units to apply when generating plants are in service or offline; and
- (iii) There is a need to request for extension of the effectivity of the urgent amendments since the PEM Board-approved urgent amendments is due to expire on 25 April 2025 and the process for DOE's approval of the general amendment, should the PEM Board approve this Resolution, may take some time;

NOW THEREFORE, we, the undersigned, on behalf of the sectors we represent, hereby resolved as follows:

RESOLVED, that the RCC approves the Proposed General Amendments to the WESM Manual on Dispatch Protocol on Issuance and Coverage of Dispatch Schedules below Minimum Stable Load attached as Annex A;

RESOLVED FURTHER, that the Proposed General Amendments are hereby endorsed to the PEM Board for approval, and subsequent submission to the DOE for final approval, and ERC for information;

RESOLVED FINALLY, that the RCC approves and endorses to the PEM Board the request extending the effectivity of the PEM Board-approved Urgent Amendments for another six (6) months.

Done this 13th day of March 2025, Pasig City.

Proposed Amendments on WESM Manual on Dispatch Protocol on
Issuance and Coverage of Dispatch Schedules below Minimum Stable Load

Approved by:
THE RULES CHANGE COMMITTEE

Independent Members:



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Chairperson



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First Gen Corporation
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Market Operator Member:


ISIDRO E. CACHO, JR.
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Proposed Amendments on WESM Manual on Dispatch Protocol on
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ANNEX A

DISPATCH PROTOCOL MANUAL 21.0					
Title	Section	Original Provision	PEM Board Approved Urgent Amendments	Proposed Amendment	Rationale
SECTION 2 DEFINITIONS, REFERENCES AND INTERPRETATION 2.1 Definitions	2.1	<u>(New)</u>	None	<u>o. In service. The in service state where a unit is electrically connected to the system and performing generation function.</u> o-p. xxx p-q. xxx q-r. xxx ... and so forth.	To provide definition of the term as used in the proposed Section 11.4.4 (a) (i) based on the following: - ERC Resolution No. 21, Series of 2016 A Resolution Adopting the Grid Management Committee's Proposed Amendments to ERC Resolution No. 17, Series of 2013 - IEEE Std 762-2006 – IEEE Standard Definitions for Use in Reporting Electric Generating Unit Reliability, Availability, and Productivity Renumbering of the succeeding numbered items due to insertion of new defined term
Section 11 – Dispatch Implementation 11.4 Issuance and Coverage of Dispatch Instruction	<u>(New)</u>	<u>(New)</u>	<u>11.4.4 Generator Dispatch Compliance for Energy Real-time Dispatch Schedules Below Minimum Stable Load or Pmin</u>	<u>11.4.4 Generator Dispatch Compliance for Energy Real-time Dispatch Schedules Below Minimum Stable Load or Pmin</u>	To provide guidance to TPs whenever they are issued with RTD schedules that are below Pmin.

Proposed Amendments on WESM Manual on Dispatch Protocol on
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DISPATCH PROTOCOL MANUAL 21.0					
Title	Section	Original Provision	PEM Board Approved Urgent Amendments	Proposed Amendment	Rationale
			a) <u>For generating unit with real-time dispatch schedule below its minimum stable load or P_{min} for the next dispatch interval, the following shall be observed:</u> (i) <u>If the generating unit is currently running or is being dispatched, it should operate at its P_{min} for that next dispatch interval.</u> (ii) <u>If the generating unit is currently offline, it should remain offline for that next dispatch interval.</u>	a) <u>For generating unit with real-time dispatch schedule below its minimum stable load or P_{min} for the next dispatch interval, the following shall be observed:</u> (i) <u>If the generating unit is currently in service, it should operate at its P_{min} for that next dispatch interval, and</u> (ii) <u>If the generating unit is currently offline, it should remain offline for that next dispatch interval.</u> <u>Provided, however, that if the generating unit is scheduled to start-up or shutdown in accordance with Section 13 of this Manual, it shall continue to operate in accordance with its start-up and shutdown profile and with the procedures set out in said Section 13.</u>	To ensure that Trading Participants comply with the existing start-up and shutdown procedures

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DISPATCH PROTOCOL MANUAL 21.0					
Title	Section	Original Provision	PEM Board Approved Urgent Amendments	Proposed Amendment	Rationale
			<u>Notwithstanding the foregoing, the <i>generating unit</i> shall follow re-dispatch instructions issued by the <i>System Operator</i> in accordance with Section 11.6 of this Manual.</u> b) <u>The <i>Trading Participant</i> shall, upon publication of the relevant <i>real-time dispatch schedule</i> in the <i>MPI</i>, communicate to the <i>System Operator</i> the action it has taken or will be taken, as may be authorized in the preceding provision, in view of the <i>resulting real-time dispatch schedule</i> for the relevant <i>dispatch interval</i>.</u> c) <u>Subject to the foregoing, the <i>Trading Participant</i> shall update its offers appropriately for the following <i>dispatch intervals</i> so that such an incident may not recur.</u>	<u>Notwithstanding the foregoing, the <i>generating unit</i> shall follow re-dispatch instructions issued by the <i>System Operator</i> in accordance with Section 11.6 of this Manual.</u> b) <u>Upon publication of the relevant <i>real-time dispatch schedule</i> in the <i>MPI</i>, the <i>Trading Participant</i> shall inform the <i>System Operator</i> of the action it will take as authorized in the preceding provision, based on the resulting <i>real-time dispatch schedule</i> for the pertinent <i>dispatch interval</i>.</u> c) <u>Subject to the foregoing, the <i>Trading Participant</i> shall update its offers appropriately for the following <i>dispatch intervals</i> so that such an incident may not recur.</u>	To emphasize that the re-dispatch instructions of the System Operator shall prevail in the event that one is issued for purposes of securing grid reliability / security. To allow the System Operator to address the possible adverse impact of the non-compliance and correspondingly take necessary actions (e.g., call another generating unit to run in place and stead of unavailable plant). To impose upon the TP the obligation to also revisit its offer submission and to revise the offers in the next intervals, if necessary, to prevent its recurrence.

ANNEX A

DISPATCH PROTOCOL MANUAL 21.0					
Title	Section	Original Provision	PEM Board Approved Urgent Amendments	Proposed Amendment	Rationale
Section 11 – Dispatch Implementation 11.4 Issuance and Coverage of Dispatch Instruction	11.4.4. Generator Dispatch Compliance Beyond Normal Grid Frequency Threshold	11.4.4. Generator Dispatch Compliance Beyond Normal Grid Frequency Threshold. a. xxx b. Once the <i>grid frequency</i> goes up to 60 Hz after coming off from a state in Section 11.4.4 (a), then the <i>Trading Participants</i> shall resume to dispatch its <i>generating units</i> to meet its <i>dispatch schedule</i>. c. xxx d. Once the <i>grid frequency</i> comes down to 60 Hz after coming off from a state in Section 11.4.4 (c), then the <i>Trading Participants</i> shall resume to dispatch its <i>generating units</i> to meet its <i>dispatch schedule</i>.	11.4.4 xxx 11.4.5 Generator Dispatch Compliance Beyond Normal Grid Frequency Threshold. a. xxx b. Once the <i>grid frequency</i> goes up to 60 Hz after coming off from a state in Section 11.4.4 11.4.5 (a), then the <i>Trading Participants</i> shall resume to dispatch its <i>generating units</i> to meet its <i>dispatch schedule</i>. c. xxx d. Once the <i>grid frequency</i> comes down to 60 Hz after coming off from a state in Section 11.4.4 11.4.5 (c), then the <i>Trading Participants</i> shall resume to dispatch its <i>generating units</i> to meet its <i>dispatch schedule</i>.	11.4.4 xxx 11.4.5 Generator Dispatch Compliance Beyond Normal Grid Frequency Threshold. a. xxx b. Once the <i>grid frequency</i> goes up to 60 Hz after coming off from a state in Section 11.4.4 11.4.5 (a), then the <i>Trading Participants</i> shall resume to dispatch its <i>generating units</i> to meet its <i>dispatch schedule</i>. c. xxx d. Once the <i>grid frequency</i> comes down to 60 Hz after coming off from a state in Section 11.4.4 11.4.5 (c), then the <i>Trading Participants</i> shall resume to dispatch its <i>generating units</i> to meet its <i>dispatch schedule</i>.	Renumbering of the succeeding provisions due to insertion of new provision



Urgent Amendment to the WESM Manual on Dispatch Protocol regarding Issuance and Coverage of Dispatch Protocol Schedule below Minimum Stable Load Assessment Report

26 October 2024 to 25 December 2024

February 2025

This Report is prepared by the
Philippine Electricity Market Corporation – Market Assessment Department
in coordination with the Enforcement and Compliance Office (Proponent)
for the Rules Change Committee

EXECUTIVE SUMMARY

As mandated by the Department of Energy (DOE) in Department Circular No. DC2014-03-009, the Philippine Electricity Market Corporation (PEMC) and the National Grid Corporation of the Philippines (NGCP), as the System Operator, formulated the Protocol for Central Scheduling and Dispatch of Energy and Contracted Reserves (PCSD). This protocol was revised by the DOE on 02 December 2014 under Department Circular No. DC2014-12-002. It outlined mechanisms for central scheduling all energy and reserve capacities covered by Energy Regulatory Commission (ERC)-approved Ancillary Services Procurement Agreement (ASPA) in the Wholesale Electricity Spot Market (WESM).

The WESM Reserve Market's full implementation, as directed by DOE Advisory 2024-01-001 SEC, commenced on 26 January 2024. However, it was subsequently returned to trial operation on 27 March 2024, per DOE Advisory 2024-03-001 SEC. This reversion aligned with the suspension of Section 8 of the Price Determination Methodology (PDM), as directed by an ERC Order issued on 25 March 2024. The ERC subsequently lifted this suspension on 26 July 2024 through a Notice of Resolution. Consequently, the DOE, through DOE Advisory 2024-08-001-SEC dated 02 August 2024, announced the resumption of the WESM Reserve Market's commercial operation on 05 August 2024.

Following the commencement and resumption of the commercial operation of the WESM Reserve Market, the Protocol has immediately ceased to be effective⁴, including provisions related to the implementation of the dispatch schedules that are below the minimum stable load or Pmin of a generating unit, as specified in Section 4.7.8 of PCSD.

On 02 October 2024, the proponent, PEMC, submitted a proposed urgent amendment to the WESM Manual on Dispatch Protocol (DPM). This amendment aims to incorporate the guidelines for the generating units having energy dispatch schedules below its Pmin, as outlined in Section 4.7.8 of the Protocol. The proponent believes that this section is relevant for effective dispatch implementation and for PEMC-Enforcement and Compliance Office's (ECO) monitoring compliance with the Dispatch Conformance Standards (DCS).

The Rules Change Committee (RCC) approved this proposal through RCC Resolution No. 2024-07 entitled *"Proposed Urgent Amendments on WESM Manual on Dispatch Protocol on Issuance and Coverage of Dispatch Schedules below Minimum Stable Load"* and subsequently endorsed it to the PEM Board. On 23 October 2024, the PEM Board approved the proposal, which became effective on 25 October 2024.

In accordance with the Section 7.4 (f) of the WESM Manual on Procedures for Changes to the WESM Rules, Retail Rules and Market Manuals (RCM), this assessment report has been prepared to assist the RCC in evaluating the implementation of the approved urgent amendment and recommending to the PEM Board a possible extension of the amendment's effectivity for an additional six (6) months. The corresponding general amendment will require approval from PEM Board, and final approval and promulgation from the DOE.

This report provides assessment based on quantitative data during the implementation of the urgent amendment from 26 October to 25 December 2024 obtained by the PEMC-Market Assessment Group

⁴ Section 1.3.1 of PCSD "This Protocol shall apply to the Market Operator, the System Operator and all WESM Members, including intending WESM Members, and WESM Participants in the electric power industry for a limited period and **shall immediately cease upon commencement of the commercial operation of the WESM reserve market** pursuant to the provisions of the DOE Department Circulars Nos. DC2014-03-0009 and DC2019-12-0018" (Emphasis supplied)

(MAG), and an overview of the application of the urgent amendment to ECO's compliance monitoring activities for DCS under specific conditions such as generator's behavior whenever having an energy dispatch schedule below its Pmin.

In the covered period, all 17,568 dispatch intervals had 4 to 56 generating units with RTD schedules below their Pmin in a region. These are equivalent to 1,821,452 generator dispatch intervals, mostly 0 MW (93.35%) schedules for generating units offered at high prices or without any offer at all, and those scheduled as dispatchable reserves, among others. The remaining positive RTD schedules below Pmin (6.65%) are attributed to generating units that are starting-up, shutting down, or with low priced generation offers and offer quantities below or at their Pmin.

Based on ECO's compliance monitoring and confirmed by data gathered by MAG, it was evident that more running/operating generating units maintain output (12.01%) rather than going to their Pmin level (3.06%), while offline generating units remain offline (84.92%). These caused deviations mostly within the range of 0 MW to -10 MW (89.21%) and 0 MW to 10 MW (9.97%), which are managed by the System Operator in real-time. In its compliance monitoring, the ECO considers the circumstances of these generating units, which include, among others, compliance with re-dispatch instructions issued by the System Operator and start-up/shutdown operations.

With the continuing implementation of the subject provisions, the System Operator may study the impact of such MW deviations to grid security. On the other hand, the ECO has recommended further amendments to the Section 11.4.4 of the DPM to reinforce the need for prior notification to the System Operator of the generator's intent to implement the provision of Section 11.4.4 and consider the start-up/shutdown profile of the generating unit.

In terms of the effectivity period of the subject urgent amendments and the time required for the corresponding general amendments to be approved, there is a need to extend the said effectivity period for guidance of the generating units and System Operator during dispatch implementation and reference of the ECO in their compliance monitoring. In view of the foregoing, the MAG recommends the RCC endorse to the PEM Board an extension of the urgent amendment's effectivity.

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1. INTRODUCTION

Prior the commencement of WESM Reserve Market, the Protocol for Central Scheduling and Dispatch of Energy and Contracted Reserves (PCSD) was promulgated to set out mechanisms for central scheduling all energy and reserve capacities for ERC-approved ASPA in WESM.

The WESM Reserve Market began full commercial operation on 26 January 2024, but reverted to trial operation on 27 March 2024, after the suspension of Section 8 of the PDM (per an ERC Order on March 25, 2024). Following the ERC's order, lifting of this suspension on 26 July 2024, the DOE announced the resumption of commercial operations on 05 August 2024 (per DOE Advisory 2024-08-001-SEC dated 02 August 2024).

With the commencement of the WESM Reserve Market, the PCSD ceased to be effective, including Section 4.7.8, which provided guidelines for generating units scheduled below their Pmin. Section A, 2.7 of the Supplemental Operating Guidelines (SOG) for the Commercial Operations of the Reserve Market (Annex A of DOE Advisory 2024-08-001 SEC) contains a similar provision as Section 4.7.8 of the PCSD but only applies to Ancillary Services Providers (ASPs).

PCSD Issue 4.0	SOG (Annex A of DOE Advisory 2024-08-001-SEC)
4.7.8 For <u>generators</u> that were scheduled below their respective technical Pmin for the next trading interval: 4.7.8.1 Trading Participants shall manage their offers appropriately for the following intervals so that such an incident may not recur. 4.7.8.2 If it is currently running or dispatched, then it should operate at its technical Pmin for that next trading interval. 4.7.8.3 If a generator is scheduled below its technical Pmin for the next trading interval, and it is currently off-line, then it should remain off-line for that next trading interval.	2.7. If <u>an AS facility</u> has a combined energy and reserve schedule below its technical Pmin for a certain dispatch interval. 2.7.1. Trading Participants shall update their offers appropriately for the next dispatch intervals so that such an incident may not recur. 2.7.2. If it is currently running or dispatched, then it should operate at its technical Pmin for that dispatch interval unless otherwise instructed by the System Operator. 2.7.3. If it is currently off-line, then it should remain off-line for that dispatch interval unless otherwise instructed by the System Operator.

Section 4.7.8 of the PCSD prescribed the actions that generators should take when scheduled below their Pmin, which are considered by the SO during the implementation of dispatch and by the ECO when monitoring compliance with the DCS. Without this provision, generators will be obliged to comply with RTD schedules below Pmin, which could be detrimental to their generating units; and there would be no guidance on the actions that generators could take during said situation, which would cause disruption to the grid.

While the PCSD was intended to be ineffective upon commencement of the reserve market, its Section 4.7.8 is still deemed necessary by the ECO. According to the ECO's report, the instances where generators are being scheduled below Pmin continue to be evident, occurring at 5.44% generator dispatch intervals, even after the Reserve Market has commenced commercial operations.

In accordance with the rules change process for urgent amendments outlined in Chapter 8 of the WESM Rules and Section 7 of the RCM, the RCC approved and endorsed the urgent proposal to the PEM Board. PEM Board-Approved urgent proposal is immediately implemented and effective up to a period of six (6) months without the final approval of the DOE. During the period, the RCC shall undertake the processing of the corresponding general amendment in accordance with Section 6 of the RCM.

As stipulated in Section 7.4 of the RCM, an assessment report on the implementation of the approved urgent amendment shall be prepared within one (1) billing period or within ninety (90) calendar days following the PEM Board's approval, i.e. for the subject urgent amendment, the assessment report shall be completed by 22 January 2025.

This report provides assessment based on quantitative data and, in coordination with ECO, an overview of the application of the urgent amendment to the compliance monitoring for DCS concerning generating units having an energy dispatched schedule below their Pmin during the covered billing periods from 26 October to 25 December 2024.

The data presented in this report, while potentially differing from other reported figures, originated from the Market Operator. Discrepancies, if any, may arise from variations in data processing. Further, changes to the Pmin of generating units were reflected based on available information.

2. DESCRIPTION OF PROPOSAL

Topic	Amendments to the WESM Manual on Dispatch Protocol regarding the Issuance and Coverage of Dispatch Schedules below Minimum Stable Load (P_{min})
Reference Code	ORCP-WR-WM-24-07
Original Proponent	Philippine Electricity Market Corporation
Date Submitted to RCC	02 October 2024
RCC Approval	RCC Resolution No. 2024-07 dated 21 October 2024
PEM Board Approval	PEM Board Resolution No. 2024-77-05 dated 23 October 2024
Documents Amended/Adopted	WESM Manual on Dispatch Protocol 21.1
Period of Effectivity of Amendments	25 October 2024

The proposal seeks to incorporate Section 4.7.8 of the PCSD, with further amendments, to the WESM Manual on Dispatch Protocol (see table below). The following objectives are outlined:

- (a) to provide guidance when generating units are scheduled below P_{min} if the generating unit is (1) currently running or dispatched, or (2) currently offline.
- (b) to highlight the importance of prioritizing the System Operator's re-dispatch instructions, when issued, in order to maintain the reliability and security of the grid.
- (c) to enable the System Operator to address the possible adverse impact of the non-compliance and correspondingly take necessary actions.
- (d) to encourage Trading Participants (TPs) to actively revisit and manage their offer submission to prevent recurrence of being scheduled below its generating unit's P_{min} .

PCSD Issue 4.0	DPM Issue 21.1
4.7.8 For <i>generators</i> that were scheduled below their respective technical P_{min} for the next <i>trading interval</i>: 4.7.8.1 <i>Trading Participants</i> shall manage their offers appropriately for the following intervals so that such an incident may not recur. 4.7.8.2 If it is currently running or dispatched, then it should operate at its technical P_{min} for that next <i>trading interval</i>.	11.4.4 Generator Dispatch Compliance for Energy Real-time Dispatch Schedules Below Minimum Stable Load or P_{min} a) For <i>generating unit</i> with <i>real-time dispatch schedule</i> below its <i>minimum stable load</i> or P_{min} for the next <i>dispatch interval</i>, the following shall be observed: (i) If the <i>generating unit</i> is currently running or is being dispatched, it should operate at its P_{min} for that next <i>dispatch interval</i>.

PCSD Issue 4.0	DPM Issue 21.1
4.7.8.3 If a <i>generator</i> is scheduled below its technical Pmin for the next <i>trading interval</i>, and it is currently off-line, then it should remain off-line for that next <i>trading interval</i>.	(ii) If the <i>generating unit</i> is currently offline, it should remain offline for that next <i>dispatch interval</i>. Notwithstanding the foregoing, the <i>generating unit</i> shall follow re-dispatch instructions issued by the <i>System Operator</i> in accordance with Section 11.6 of this Manual. b) The <i>Trading Participant</i> shall, upon publication of the relevant <i>real-time dispatch schedule</i> in the <i>MPI</i>, communicate to the <i>System Operator</i> the action it has taken or will be taken, as may be authorized in the preceding provision, in view of the <i>resulting real-time dispatch schedule</i> for the relevant <i>dispatch interval</i>. c) Subject to the foregoing, the <i>Trading Participant</i> shall update its offers appropriately for the following <i>dispatch intervals</i> so that such an incident may not recur.

This proposal is relevant for dispatch implementation and serves as a continuing guideline for the ECO in monitoring the compliance of the DCS. Specifically, the proposal aims to ensure Trading Participants' ability to react accordingly when its generating units are scheduled below Pmin and the System Operator's ability in maintaining grid stability and reliability from such consequent and permitted actions made by generating units, and implement the order of the DOE, as provided in DOE Advisory 2024-08-001-SEC.

The RCC approved the proposal as urgent amendment and endorsed it to the PEM Board through the RCC Resolution No. 2024-07. The proposal took effect upon PEM Board approval (PEM Board Resolution No. 2024-77-05). The PEM Board-approved urgent proposal is effective from 25 October 2024 until 25 April 2025 (for a period of six (6) months) or until the corresponding general amendment is promulgated by the DOE, whichever is earlier.

3. IMPLEMENTATION OF PROPOSED AMENDMENTS

Section 4.7.8 of the PCSD was originally utilized by the ECO as one of their guidelines in DCS monitoring. Following the integration of this section, as amended, to the WESM Manual on Dispatch Protocol (DPM), ECO now references Section 11.4.4 of the DPM.

The implementation of said provision is contingent on the scheduling of generating units below their Pmin. As explained by the MO during the 237th RCC (Special) Meeting⁵ on 10 October 2024, such schedules may occur when the generation offers by scheduled generating units or nominations of loading levels of non-scheduled generating units are below their Pmin. Section I herein provides descriptive statistics to provide information on such occurrences.

The said provision provides specific instructions to generating units based on their operational status, i.e. when running/online, to generate at Pmin level; alternatively, when offline, to stay offline. ECO's analysis on the actions made by generators during such occurrences is presented in Section II.

The data in this report cover the November and December 2024 billing periods from 26 October to 25 December 2024. Discrepancies between Sections I and II arise from, among others, variations in data processing. Processed data in Section I also considered 0 MW RTD schedules and excluded generating units that are classified as must dispatch, priority dispatch and non-scheduled, on outage and undergoing testing and commissioning. Further, assessment is focused on per generator dispatch interval data, i.e. generating unit data per dispatch interval⁶, and does not consider trend analysis on generator behavior/action prior and after a given dispatch interval.

I. Occurrences of RTD Schedule below Minimum Stable Load or Pmin

Over the course of November and December 2024 billing periods, it was observed that there were a number of generator dispatch intervals where the real-time dispatch (RTD) schedules fell below the Pmin of the generating unit. Of the total 8,408,397 generator dispatch intervals, 2,973,794 (35.37%) have RTD schedules below Pmin.

The data set was narrowed down to 1,821,452 generator dispatch intervals (21.66%), excluding the intervals where the generating unit is: (1) under testing and commissioning and was scheduled through over-riding constraints, (2) classified as a must dispatch, priority dispatch and non-scheduled generating unit and was scheduled based on its projected outputs or loading levels, and (3) out of service due to outage. This data is further described as follows:

- By region, 377,419 (20.72%) generator dispatch intervals in Luzon, 820,168 (45.03%) in Visayas and 623,865 (34.25%) in Mindanao

⁵ [RCC-MIN-24-11 Minutes of 237th RCC \(Special\) Meeting \(10 October 2024\)](#)

⁶ For example, every dispatch interval on 25 December 2024 had 481 generator dispatch intervals, such that there are 138,528 generator dispatch intervals on said date.

- By RTD schedule, 1,700,318 (93.35%) at 0 MW and 121,134 (6.65%) greater than 0 MW
- By resource type, 1,565,067 (85.92%) generator dispatch intervals were oil-based generating unit, 137,847 (7.57%) were natural gas, 76,125 (4.18%) were hydro, 38,406 (2.11%) were coal, and 4,007 (0.22%) were geothermal. (see Figure 1)

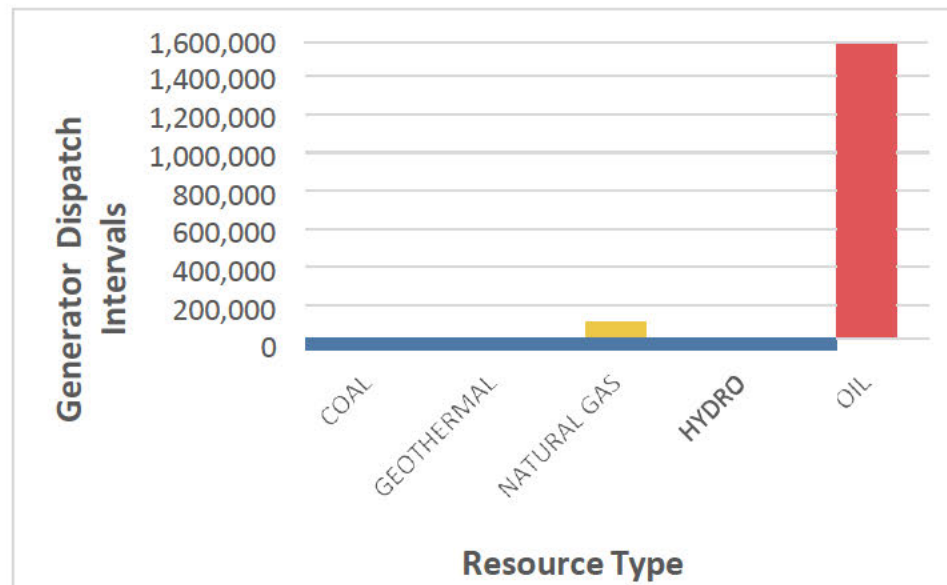


Figure 1. Generator Dispatch Intervals with RTD Schedules below Pmin, per Resource Type

The statistics, as mentioned above, shows that most of the generator dispatch intervals with RTD schedules below Pmin occurred mostly in Visayas and involved oil-based generating units. Data also showed that all 17,568 dispatch intervals in the covered period had 4 to 56 generating units with RTD schedules below their Pmin in a region.

Further analysis of these occurrences revealed the following contributing factors:

- Generators had offer blocks with low offer prices and offer quantities below their Pmin.
- Generators had offer blocks with low offer prices and offer quantities at Pmin, but only a portion of the offered quantity was cleared.
- Generators were undergoing start-up or shutdown operations.
- Generators were scheduled to provide contingency or dispatchable reserves.

Furthermore, generator responses to RTD schedules below their Pmin are influenced, among others, by factors such as plant status (e.g., tripping) and System Operator re-dispatch instructions to provide reserves or to generate more or less than its RTD schedule (i.e. based on the Merit Order Table).

Any deviation between the RTD schedule and actual MW output are necessarily managed by the System Operator to ensure and maintain system reliability through reserves and providing dispatch instructions to other generating units.

The subject Section 11.4.4 of the DPM allows the generating units to deviate from their RTD schedules when these schedules are below Pmin. This is notwithstanding the DCS in Section 12.5.1 of the same Manual, which stipulates that generating units must not deviate beyond the upper and lower dispatch thresholds of the dispatch schedule (+1.5% or -3%, respectively) or +/- 1 MW, whichever is greater. Such that, when a generating unit is flagged for probable breach of the DCS when its RTD schedule is below its Pmin and ECO found that the generating unit operated based on Section 11.4.4 of the DPM, the generating unit will be deemed compliant with the DCS. Section II further describes this assessment by the ECO.

The following discussion focuses on the 1,821,452 generator dispatch intervals where RTD schedule was below Pmin, examining the MW deviation of generating units from their RTD schedules. Table 1 describes the observed ranges of MW deviations (i.e. "MW deviation" in this report is the difference between the actual output of the plant and RTD schedule in MW).

Deviation Range (MW)	Generator Dispatch Intervals
$X \leq -100\text{MW}$	57
$-100\text{MW} > X \geq -50\text{MW}$	90
$-50\text{MW} < X \leq -20\text{MW}$	778
$-20\text{MW} < X \leq -10\text{MW}$	378
$-10\text{MW} < X \leq 0\text{MW}$	1,624,922
$0\text{MW} < X \leq 10\text{MW}$	181,647
$10\text{MW} < X \leq 20\text{MW}$	7,591
$20\text{MW} < X \leq 50\text{MW}$	5,587
$50\text{MW} < X < 100\text{MW}$	350
$100\text{MW} < X \leq 200\text{MW}$	48
$200\text{MW} < X < 300\text{MW}$	4
Total	1,821,452

**Table 1. MW Output Deviation per Generator Dispatch Interval
where $X = \text{Actual MW Output} - \text{RTD schedule}$**

As shown in Table 1, a significant 1,624,922 generator dispatch intervals, representing 89.10% of the total, exhibit MW deviations within the range of -10 MW to 0 MW. This indicates that generators are mostly operating very close to, or slightly below, their RTD schedules. Furthermore, 181,647 generator dispatch intervals are within the range of 0 MW to 10 MW.

In a further analysis of MW deviation per Section 11.4.4 (a)(i) and (a)(ii) of the DPM, the actual MW output is grouped into the following categories:

- (i) Actual MW output is equal to Pmin, such that the generating unit is currently running or is being dispatched (Section 11.4.4 (a)(i));
- (ii) Actual MW output is equal to 0 MW, such that the generating unit remained offline (Section 11.4.4 (a)(ii)), when the RTD schedule was equal to or above 0MW;
- (iii) Actual MW output is above Pmin; and
- (iv) Actual MW output is below Pmin and greater than 0MW.

Table 2 shows 55,814 (3.06%) generator dispatch intervals where generators operated at their Pmin, in compliance with Section 11.4.4(a)(i) of the DPM. There were 1,541,629 (84.64%) generator dispatch intervals with generators at 0MW when the RTD schedule was at 0MW, while there were 5,211 (0.29%) generator dispatch intervals with generators at 0MW when RTD schedule was below Pmin and above 0MW. Furthermore, 100,491 (5.52%) generator dispatch intervals had actual MW output greater than Pmin, and 118,307 (6.49%) generator dispatch intervals had actual MW output below Pmin but greater than 0MW. These latter numbers show that there are generators that, for various reasons, do not go to their Pmin levels, as required under DPM Section 11.4.4 (a)(i), when their RTD schedules are below Pmin. Meanwhile, there were instances observed when hydro-powered generating units receive 0MW RTD schedules while nearing the end of their pumping operations.

Deviation Range (MW)	Generator Dispatch Intervals					
	Pursuant to Section 11.4.4 (a)(i) of DPM Actual MW = Pmin	Pursuant to Section 11.4.4 (a)(ii) of DPM Actual MW = 0MW		Actual MW Output above Pmin	Actual MW Output below Pmin & >0MW	Total
		When RTD > 0MW	When RTD = 0MW			
X<=-100MW		1			56	57 (0.003%)
-100MW>X>=-50MW		26			64	90 (0.005%)
-50MW<X<=-20MW		102			676	778 (0.04%)
-20MW<X<=-10MW		96			282	378 (0.02%)
-10MW<X<=0MW		4,986	1,541,629		78,307	1,624,922 (89.21%)
0MW<X<=10MW	55,781			87,598	38,268	181,647 (9.97%)
10MW<X<=20MW	7			7,311	273	7,591 (0.42%)
20MW<X<=50MW	21			5,274	292	5,587 (0.31%)
50MW<X<100MW	4			261	85	350 (0.02%)
100MW<X<=200MW	1			44	3	48 (0.003%)
200MW<X<300MW				3	1	4 (0.0002%)
Total	55,814 (3.06%)	5,211 (0.29%)	1,541,629 (84.64%)	100,491 (5.52%)	118,307 (6.49%)	1,821,452 (100.00%)

**Table 2. Implementation of Section 11.4.4 (a) of WESM Dispatch Protocol Manual
MW Output Deviation per Generator Dispatch Interval,
where X = Actual MW Output – RTD schedule**

In reference to the preceding analysis, Figure 2 illustrates the regional comparison of total MW deviations per region and per dispatch interval (i.e. sum of MW deviation of generators with RTD schedule below Pmin in a dispatch interval) across the covered billing period from 26 October to 25 December 2024. It shows similar patterns across Luzon, Visayas, and Mindanao, with MW deviations concentrated around 0MW, indicating an overall trend of small deviations. This suggests that generators maintain close adherence to their RTD schedules, even when the RTD schedule is below Pmin. Notably 1,541,629 (84.64%) generator dispatch intervals have 0MW RTD schedules and 0MW actual MW output. Of these, 213,998 (13.88%) generator dispatch intervals are from Luzon, 752,946 (48.84%) from Visayas and 574,685 (37.28%) from Mindanao. However, significant deviations within the ranges of -400MW to -200MW and 400MW to 600MW were observed in Visayas and Luzon, respectively.

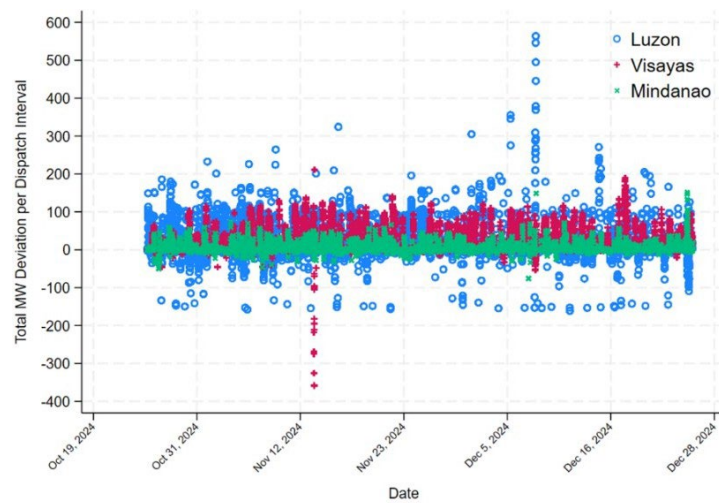


Figure 2. Total MW Deviation per Generator Dispatch Interval when RTD schedule below Pmin

The maximum number of generator dispatch intervals per generating unit during the covered period was 17,568 (i.e. same number of dispatch intervals). Figure 3 depicts the duration that generators were scheduled below Pmin per region and resource type. Oil-based generating units demonstrated the highest maximum duration as most were scheduled to provide dispatchable reserves and often submit high-priced energy offers.

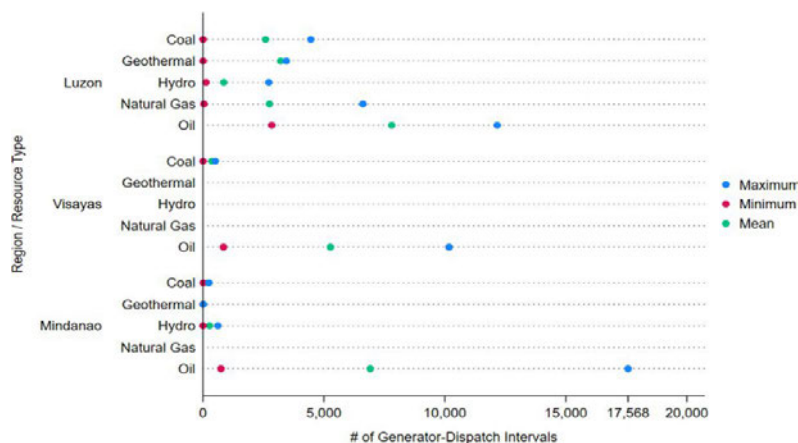


Figure 3. Maximum, Minimum, and Mean duration when the RTD schedule below Pmin

Moreover, as shown in Figure 1 and as demonstrated in Figure 4, oil-based generating units had the highest total generator dispatch intervals, wherein a significant 1,409,566 (90.06%) were recorded with actual generation at 0MW and 53,353 (3.41%) were at Pmin, pursuant to Section 11.4.4 (a)(ii) and Section 11.4.4 (a)(i) of DPM, respectively. Conversely, a geothermal generating unit exhibited 4,007 (0.22%). Of these, 35 (0.88%) were recorded at 0MW and 5 (0.13%) where at Pmin and 3,967 (99.00%) where either above Pmin or below Pmin but not at 0MW.

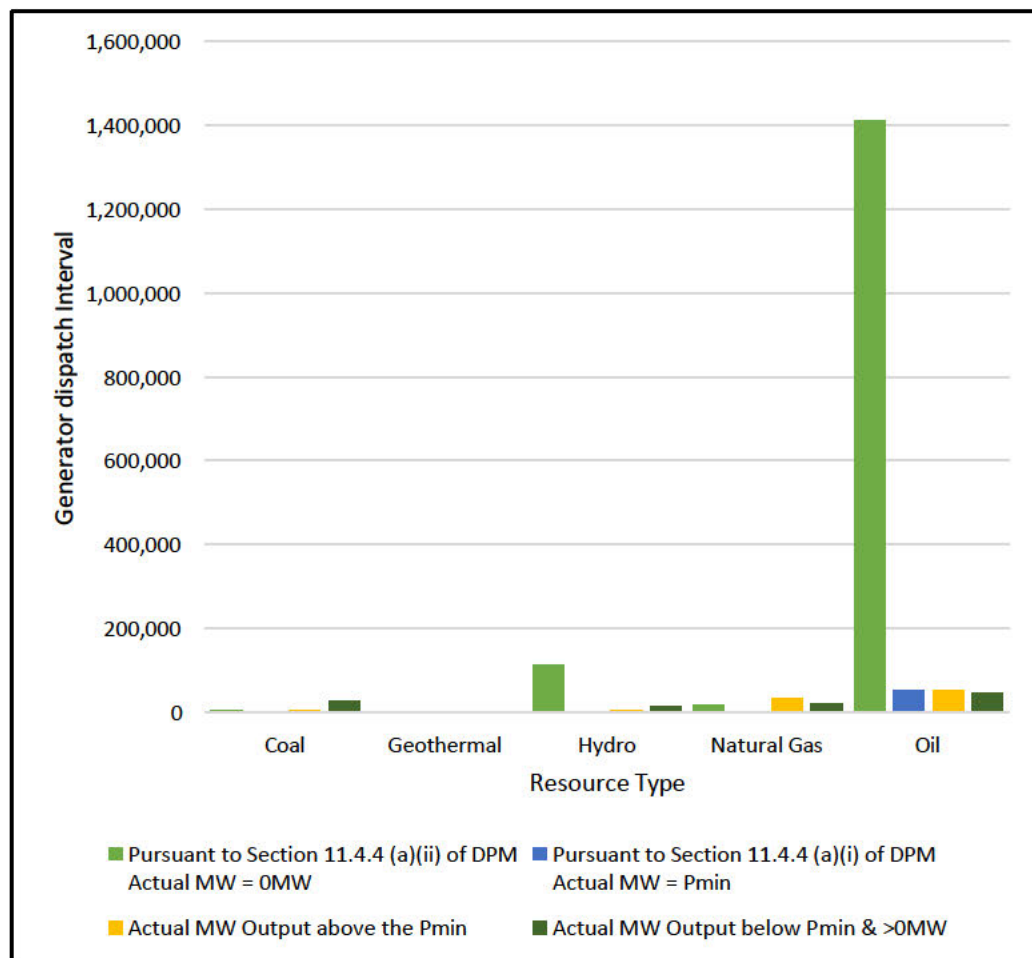


Figure 4. Implementation of Section 11.4.4 (a) of WESM Dispatch Protocol Manual, per Resource Type

In reference to the Final Settlement Prices during the covered period, 80.55% of the 1,821,452 generator dispatch intervals with RTD schedules below Pmin were settled at prices between Php 0/MWh and Php 5,000/MWh. When only generator dispatch intervals with actual generation above 0MW are considered, 74.16% of the 222,808 intervals were similarly settled within the said final settlement price range. These are shown in Figure 5, which also shows that the majority of the generator dispatch intervals with RTD schedules below Pmin have final settlement prices less than Php 10,000/MWh.

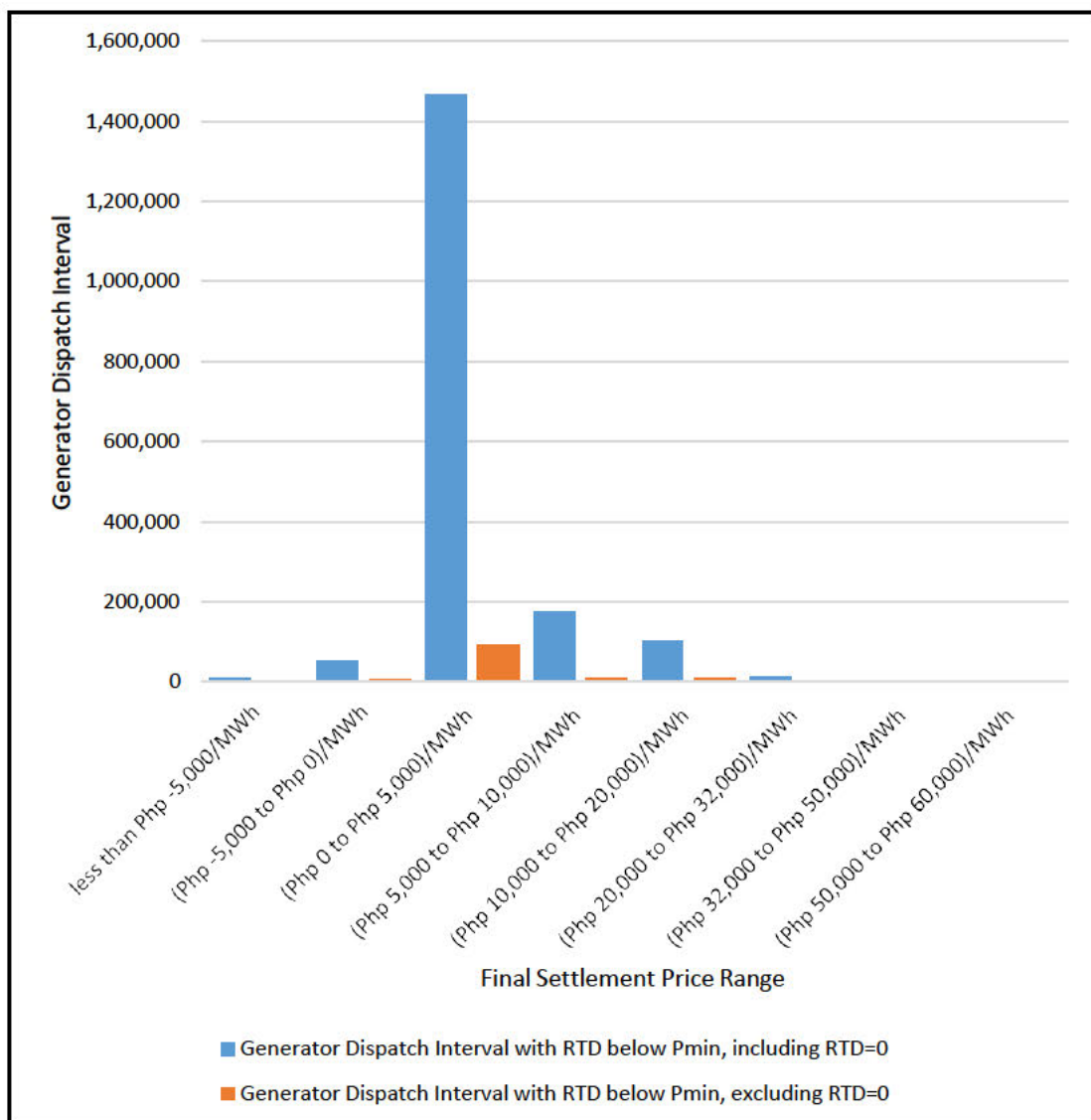


Figure 5. Final Settlement Prices when RTD Schedule is below Pmin

Figure 6 shows the final settlement prices per MW deviation range of generating units with actual output above 0MW and RTD schedules below Pmin that are either equal (top chart) or above (below chart) 0MW. In both RTD schedule scenarios, generating units with MW deviation that are above 50 MW mostly have final settlement prices below Php 20,000/MWh. Notably, there were 4 generator dispatch intervals with MW deviation between 0MW to 10MW and RTD schedule above 0MW with final settlement prices within the range of Php 50,000/MWh to Php 60,000/MWh.

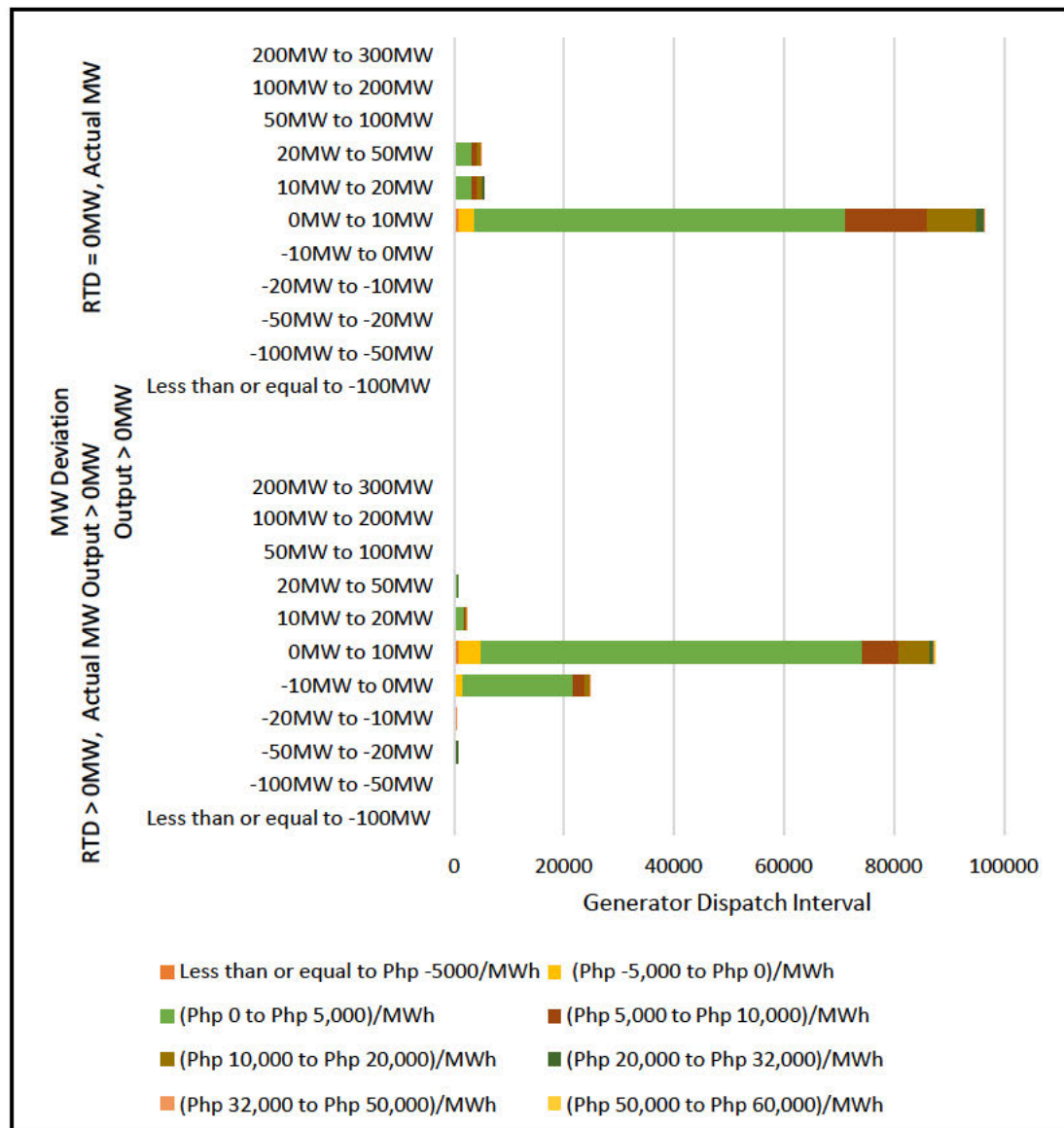
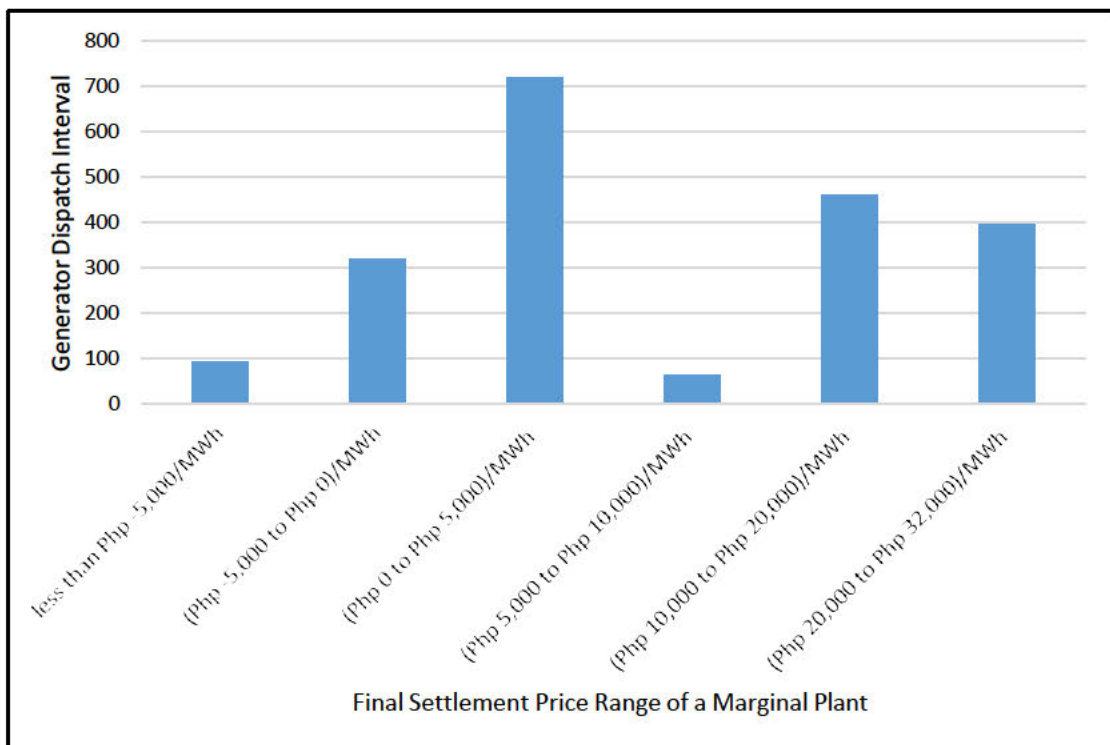


Figure 6. Final Settlement Prices when Actual MW is above 0MW and RTD Schedule is equal or above 0MW

Moreover, during the period, there were 2,048 generator dispatch intervals with generating units that were marginal plants with RTD schedules below Pmin. A marginal plant is the last generating unit scheduled to meet the system demand. Figure 7 shows the final settlement price of the marginal plants during the covered period. It illustrates intervals with the corresponding final settlement prices, 35.06% within the range of Php 0/MWh to Php 5,000/MWh, 22.41% at Php 10,000/MWh to Php 20,000/MWh, and 19.34% above Php 20,000/MWh. The foregoing indicate that there are instances when generating units with higher priced offers may be dispatched and could even set market prices at quantities less than their Pmin.



**Figure 7. Final Settlement Prices when RTD Schedule is below Pmin,
when offer price = marginal price**

II. Enforcement and Compliance

The ECO reported that for the covered period 5.44% of generator dispatch intervals, totaling 219,275, had RTD schedules that were below the Pmin of the generating units. Of these, 2.85% (or 6,256 intervals) were flagged as probable breaches⁷ by the MMS. Specifically, 6,159 of these intervals were generating units classified as scheduled generating units, while the remaining 55 and 42 intervals were from priority dispatch and must-dispatch generating units, respectively.

The ECO processes these data and conducts daily monitoring, validation, and assessment of compliance with Offered Capacity Compliance (OCC) and DCS. The consolidated Compliance Monitoring and Assessment Reports (CMARs), which consist of data on the number of justified probable breaches, are published no later than the 45th day of the month following the end of the covered monitoring period.

In reference to the rationale of the approved urgent amendment as outlined in Annex A, ECO noted observations during the implementation are as follows:

- (i) Some generators, especially conventional units, maintained generation output even when RTD schedules fell below their Pmin.
- (ii) In some instances, offline generating units were assigned RTD schedules below their Pmin. Trading Participants explained that keeping the units offline, rather than running them below Pmin, helped reduce the risk of mechanical failure or damage. Additionally, some RTD schedules were too brief, making startup and stabilization impractical. Given the short and intermittent nature of these schedules, remaining offline was seen as a safer and more practical option. However, the ECO states that Section 11.4.4 of the DPM does not cover preemptive action such as decision to remain offline in the subsequent intervals even if the generating unit is dispatched above its Pmin for several intervals.
- (iii) The System Operator may need to issue critical re-dispatch instructions, even when units' dispatch schedules fall below Pmin, to ensure grid reliability and security. These instructions, as per Section 11.4.4 of the DPM, take precedence over RTD schedules to prioritize grid stability and operational efficiency.
- (iv) Some plants regularly communicate with the System Operator to report actions or seek approval for maintaining their Pmin. However, others, due to the short five-minute window to respond to sub-Pmin RTD conditions, are unable to consult the System Operator.
- (v) Trading Participants typically do not update their MW offers frequently, particularly when RTD schedules are below Pmin. Trading Participants may have limited opportunities to adjust their offers since their generation is already operating at its lowest or most efficient level. However, some Trading Participants keep their MW offers constant while adjusting price blocks in

⁷ Per WESM Dispatch Protocol Manual Section 12.5.2 “*Detection of Non-Compliance and Possible Breach*” and Appendix F “*Counting the Non-Compliance and Possible Breach*”

response to real-time market conditions. These adjustments demonstrate that TPs aim to actively respond to the market conditions by adjusting the price blocks within the available time frame which may prevent RTD schedules below P_{min} to recur in the subsequent intervals.

- (vi) Not all RTD schedules below P_{min} require the application of Section 11.4.4 of the DPM, which allows generating units to maintain or reach P_{min} . Plants may receive such schedules when ramping up from an outage or offline status, aligning with their startup or shutdown profiles. In these cases, Section 11.4.4 does not apply, as plants are expected to ramp up or down gradually.

Following the above observations, ECO deemed the inclusion of the provisions under Section 11.4.4 of the DPM necessary. ECO recommended updating the rules to clarify scenario (vi) and provide clear criteria for the applicability of Section 11.4.4 and suggested further refinements may be made to:

- (i) Reinforce the need for prior notification to the System Operator of the generator's intent to implement the provision of Section 11.4.4. This would give the System Operator the opportunity to respond immediately to a possible generation shortfall due to the actions taken by the plant, either by securing ancillary services, re-dispatching other plants to fill any deficiency, or providing specific appropriate instructions to the concerned generators.
- (ii) Consider the start-up/shutdown process, allowing plants to proceed with the resulting RTD schedules aligned with their load profile and generation offer submissions.

4. CONCLUSION AND RECOMMENDATIONS

In accordance with the objectives of the approved urgent amendment regarding the inclusion of Section 11.4.4 in the WESM Dispatch Protocol Manual, the ECO has referred to these provisions in their monitoring of compliance with the Dispatch Conformance Standards. While it was found that most of the time generators maintained their generation output instead of running at P_{min} level (per Section 11.4.4 (a) (i)) or staying offline (per Section 11.4.4 (a) (ii)) when provided with RTD schedules below P_{min} , considerations such as the duration of such schedule, System Operator re-dispatch instructions, and lead-time for the Trading Participant to coordinate with the System Operator, affect their operational decisions and are considered by ECO.

While such generation output cause MW deviations such that actual output does not fully comply with the RTD schedule, the System Operator has managed grid security and stability and has required the prior communication by generators of their operational decisions. The System Operator may study the impact of such MW deviations to grid security.

In terms of the effectivity period of the subject urgent amendments and the time required for the corresponding general amendments to be approved, there is a need to extend the said effectivity period for continuity of the compliance monitoring of ECO.

In view of the foregoing, the MAG recommends the RCC to endorse to the PEM Board the extension of effectivity of the urgent amendment and for the ECO to continue its implementation of the urgent amendment depending on the PEM Board's decision and approval on the RCC's recommendation.

ANNEX A: Updates on the Implementation of the Urgent Amendment

Dispatch Protocol Manual 21.0						
Title	Section	Provision	Proposed Amendment	Rationale	Implementation	
					Y/N	Remarks
Section 11 – Dispatch Implementation 11.4 Issuance and Coverage of Dispatch Instruction		<u>(NEW)</u>	<u>11.4.4 Generator Dispatch Compliance for Energy Real-time Dispatch Schedules Below Minimum Stable Load or Pmin</u>	To provide guidance to TPs whenever they are issued with RTD schedules that are below Pmin.	Y	Implemented
			c) <u>For generating unit with real-time dispatch schedule below its minimum stable load or Pmin for the next dispatch interval, the following shall be observed:</u> <u>(iii) If the generating unit is currently running or is being dispatched, it should operate at its Pmin for that next dispatch interval.</u> <u>(iv) If the generating unit is currently offline, it should remain offline for that next trading interval.</u>		Y	Implemented
			<u>Notwithstanding the foregoing, the generating unit shall follow re-dispatch instructions issued by the System</u>		Y	Implemented

ANNEX A: Updates on the Implementation of the Urgent Amendment

Dispatch Protocol Manual 21.0						
Title	Section	Provision	Proposed Amendment	Rationale	Implementation	
					Y/N	Remarks
			<u>Operator in accordance with Section 11.6 of this Manual.</u> d) <u>The Trading Participant shall, upon publication of the relevant RTD schedule in the MPI, communicate to the System Operator the action it has taken or will be taken, as may be authorized in the preceding provision, in view of the resulting real-time dispatch schedule for the relevant dispatch interval.</u> e) <u>Subject to the foregoing, the Trading Participant shall update its offers appropriately for the following dispatch intervals so that such an incident may not recur.</u>	the System Operator shall prevail in the event that one is issued for purposes of securing grid reliability / security. To allow the System Operator to address the possible adverse impact of the non-compliance and correspondingly take necessary actions (e.g., call another generating unit to run in place and stead of	Y	Implemented

ANNEX A: Updates on the Implementation of the Urgent Amendment

Dispatch Protocol Manual 21.0						
Title	Section	Provision	Proposed Amendment	Rationale	Implementation	
					Y/N	Remarks
				<u>unavailable plant).</u> <u>To impose upon the TP the obligation to also revisit its offer submission and to revise the offers in the next intervals, if necessary, to prevent its recurrence.</u>		
Section 11 – Dispatch Implementation 11.4 Issuance and Coverage of Dispatch Instruction	11.4.4. Generator Dispatch Compliance Beyond Normal Grid Frequency Threshold	11.4.4. Generator Dispatch Compliance Beyond Normal Grid Frequency Threshold. a. xxx b. Once the grid frequency goes up to 60 Hz after coming off from a state in Section 11.4.4 (a), then the Trading Participants shall	11.4.4 xxx 11.4.5 Generator Dispatch Compliance Beyond Normal Grid Frequency Threshold. a. xxx b. Once the grid frequency goes up to 60 Hz after coming off from a state in Section 11.4.4 11.4.5 (a), then the Trading Participants shall	<u>Renumbering of the succeeding provisions due to insertion of new provision</u>	Y	Implemented

ANNEX A: Updates on the Implementation of the Urgent Amendment

Dispatch Protocol Manual 21.0						
Title	Section	Provision	Proposed Amendment	Rationale	Implementation	
					Y/N	Remarks
		resume to dispatch its generating units to meet its dispatch schedule. c. XXX d. Once the grid frequency comes down to 60 Hz after coming off from a state in Section 11.4.4 (c), then the Trading Participants shall resume to dispatch its generating units to meet its dispatch schedule.	resume to dispatch its generating units to meet its dispatch schedule. c. XXX d. Once the grid frequency comes down to 60 Hz after coming off from a state in Section 44.4.4 11.4.5 (c), then the Trading Participants shall resume to dispatch its generating units to meet its dispatch schedule.			