

**MINUTES OF MEETING****Rules Change Committee****154<sup>th</sup> Regular Meeting (No. 2019-07)**

19 July 2019, 9:00 AM – 3:00 PM

18/F PEMC Executive Board Room, Robinsons Equitable Tower  
Ortigas Center, Pasig City

| Agenda  | Presenter   | Action Required   |
|---|---|---|
| I. Call to Order  |   |   |
| II. Determination of Quorum   |   | There being a quorum, Dr. Allen Nerves (Independent) called the meeting to order at around 9:10 AM. |
| Attendance List   |   |   |
| In-attendance   | Not In-attendance   |   |
| <u>Rules Change Committee</u><br><br><i>Principal Members:</i><br><br><b>Maila Lourdes G. de Castro</b> , Chairperson – Independent<br><b>Francisco Leodegario R. Castro, Jr.</b> – Independent<br><b>Concepcion I. Tanglao</b> – Independent<br><b>Allan C. Nerves</b> – Independent<br><b>Abner B. Tolentino</b> – Generation (PSALM)<br><b>Cherry A. Javier</b> – Generation (APC)<br><b>Dixie Anthony R. Banzon</b> – Generation (MPPCL)<br><b>Ryan S. Morales</b> – Distribution (MERALCO)<br><b>Jose P. Santos</b> – Distribution (INEC)<br><b>Ricardo G. Gumalal</b> – Distribution (ILPI)<br><b>Virgilio C. Fortich, Jr.</b> – Distribution (CEBECO III)<br><b>Lorreto H. Rivera</b> – Supply (TPEC)<br><b>Ambrocio R. Rosales</b> – System Operator (NGCP)<br><b>Isidro E. Cacho</b> – Market Operator (IEMOP) | <b>Jose Ildebrando B. Ambrosio</b> – Generation (NorthWind) |   |

**DOE Observers:**

Ferdinand B. Binondo  
Ann Margaret Andres  
Ryan Jaspher Villadiego

**PEMC – Market Assessment Group (MAG)**

Elaine D. Gonzales  
John Mark S. Catriz  
Aldjon Kenneth M. Yap  
Divine Gayle C. Cruz  
Joseph Angelo M. Ocampo

**PEMC – Legal**

Atty. Monica M. Martin

**PEMC – Enforcement and Compliance**

Atty. Hazel Gubaton-Lopez  
Geraldine A. Rodriguez

| Agenda   | Presenter                         | Action/s Taken  |
|--|-----------------------------------|---|
| III. Adoption of the Agenda  | Secretariat                       | Approved as revised   |
| Agenda   | Presenter                         | Action/s Taken  |
| IV. Review of the Minutes of the Previous Meeting (153 <sup>rd</sup> Meeting, 21 June 2019)                                | Secretariat                       | Approved as revised   |
| V. Matters Arising from Previous Meetings  |                                   |   |
| Agenda   | Presenter                         | Action/s Taken  |
| 5.1. Deliberation on PEMC's Proposed Amendments to the WESM Rules regarding WESM Compliance Officers Accreditation Program | Ms. Geraldine A. Rodriguez (PEMC) | Deferred pending submission of Proposed Guidelines for WESM Compliance Officers Accreditation Program |

- 1 Ms. Geraldine A. Rodriguez from the PEMC Enforcement and Compliance Office
- 2 (PEMC-ECO) assisted the RCC in its deliberation of the proposed amendments to the

WESM Rules regarding WESM Compliance Officers Accreditation Program. Comments from Aboitiz Power Corporation (APC), SPC Power Corporation (SPC) and Team Energy were accordingly attended by PEMC for consideration of the RCC.

*Please find attached Annex A – Deliberation on Proposed Amendments to the WESM Rules Providing for the Implementation of a WESM Compliance Officer Accreditation Program*

Following the discussion, Atty. Maila Lourdes G. De Castro inquired on the timeline of submission of the Guidelines for WESM Compliance Officer Accreditation Program. Atty. Hazel M. Gubaton-Lopez stated that several workshops have already been made to gather inputs from WESM Compliance Officers. She added that the final draft shall be presented on 20 August 2019 and may be submitted by the last week of August or first week of September. Atty. De Castro then recommended to await the submission of the said guidelines in order to see the entire picture of the program for a more efficient deliberation.

There being no other matters left for discussion, the deliberation on the proposal was deferred pending the submission of the Proposed Guidelines for WESM Compliance Officers Accreditation Program.

| Agenda  | Presenter   | Action/s Taken                            |
|---|-------------|---|
| 5.2. Draft RCC Resolution No. 2019-10: Approval of Proposed Amendments to the WESM Manual on Metering Standards and Procedures Issue 12.0 | Secretariat | Approved for endorsement to the PEM Board |

The Secretariat presented the draft RCC Resolution No. 2019-10 approving the proposed amendments to the WESM Manual on Metering Standards and Procedures Issue 2.0. The RCC was informed that the resolution, including the matrix of the amendments, has already been reviewed by the proponent with corresponding minor revisions mostly on the rationale. However, there were provisions that were likewise subjected to further revisions, which the RCC discussed as follows:

- Section 2.5.2 Use of Instrument Transformers

Ms. Concepcion I. Tanglao suggested removing a phrase as the following paragraph says the same and gives the conditions thereto. The provision now reads:

xxx

**The following scheme shall be temporarily permitted:**

**Meters covered by Energy Conversion Agreements (ECA) contracts which were already in effect prior to the operation of WESM shall be temporarily permitted to share the instrument transformers used for WESM metering until the end of the ECA cooperation period; provided that the ECA and WESM meters shall have separate meter enclosure/box and that the secondary terminals of the instrument transformers are properly sealed.**

- **Section 2.5.4.1 Current Transformers**

Mr. Ryan S. Morales inquired if the note has relevance in the provision (see table below). Mr. Ambrocio R. Rosales, on the other hand, opined that the note may be more appropriate if placed in the rationale section. The Secretariat then noted that the same revision was proposed in the next section (Section 2.5.4.2 Voltage Transformer) but without the notes as provided in this section. Dr. Nerves however explained that regardless of the note, the standards are already provided in the Philippine Grid Code (PGC) which is reflected in the provision. Ms. Cherry A. Javier then pointed out that Section 2.5.4.3<sup>1</sup> already provides for the requirement of submission of routine test reports, hence the removal of the phrase. Mr. Morales then raised that the routine test report in the referred section is the factory routine test report which is only done once after manufacturing the equipment. This was supported by Dr. Nerves who expressed that there shall be a calibration test for these equipment which should be defined in the manual. Mr. Isidro E. Cacho, Jr. then raised that the PGC Section 9.2.5.3.3 provides that the metering services provider (MSP) may perform a meter accuracy test at least once every two (2) years following the procedures reviewed by the ERC. Following the discussion of the RCC, it was agreed that the note be reflected in the rationale where it is more deemed applicable. The provision now reads:

| Proposed Amendment (21 June 2019)   | RCC Agreement   |
|---|---|
| Current transformers shall <b><u>adhere to the requirements of the prevailing PGC IEC 44-1 Class 0.2 or ANSI C57.13 Class 0.3 or better of any instrument transformer. In addition, the accuracy of the current transformers shall be guaranteed from 0-100% of the rated burden, supported by routine test report.</u></b> | Current transformers shall <b><u>adhere to the requirements of the prevailing PGC IEC 44-1 Class 0.2 or ANSI C57.13 Class 0.3 or better of any instrument transformer. In addition, the accuracy of the current transformers shall be guaranteed from 0-100% of the rated burden, supported by routine test report.</u></b> |
| <b><u>Notes: 0% rated burden means no additional external burden is connected to</u></b>  | <b><u>Notes: 0% rated burden means no additional external burden is connected to</u></b>  |

<sup>1</sup> Section 2.5.4.3 Proof of Accuracy Compliance. Proof of compliance with Sections **2.5.4.1 and 2.5.4.2** shall be provided in the form of factory **routine** test cards complete with **reports showing the** serial numbers **of the instrument transformers.**



| Proposed Amendment (21 June 2019)  | RCC Agreement  |
|--|--|
| <u><i>the CT during testing. The inherent burden of the test instruments used are neglected.</i></u> | <u><i>the CT during testing. The inherent burden of the test instruments used are neglected.</i></u> |

• Section 2.11 Metering Installation – Existing

Ms. Tanglao commented on the appropriateness in allowing the use of existing metering installations which are only non-compliant with the mass memory requirement. Mr. Cacho recalled that the DOE already required for compliance plan for affected metering installations. Pending this, the provision allows for meters to remain in service until it reach its economic life. Mr. Rosales, on the other hand, opined that these cases should not be subjected for approval. Mr. Cacho affirmed that there are no procedures in place for the approval of exempted metering installations and that the Market Operator does not decide on these matters. He added that for as long as the PGC requirements are met, metering installations shall be registered in the WESM. Mr. Ferdinand B. Binondo then clarified that there was indeed an order for MSPs to comply with the requirements of the new market management system (MMS) but with the request of the MSPs, the DOE allowed for exemptions if meters are only non-compliant to the mass memory requirements. Mr. Cacho then suggested to also clarify in the provision that meters shall likewise be replaced when defective even if it has not yet reached the end of its economic life.

Atty. De Castro then inquired on the impact of allowing these meters to remain in service. Mr. Cacho explained that this will impact the data gathering procedures of the MSPs because once the meters are re-programmed from recording 15-minute data to 5-minute data, the storage capability will be shortened from sixty (60) days to about twenty (20) days.

Considering the discussions above, the provision was accordingly revised and now reads:

| Proposed Amendment (21 June 2019)   | RCC Agreement   |
|---|---|
| <i>An existing Metering Installation that does not fully comply with the requirement of this standard will be permitted by the Market Operator to remain in service subject to the following conditions:</i>                | <i>An existing Metering Installation that does not fully comply with the requirement of this standard <u>shall will be permitted by the Market Operator to</u> remain in service subject to the following conditions:</i>   |
| <i>a. <del>The meter shall have a mass memory capable of recording the 5-minute required demand interval data for a period of at least 60 days and have communication ports for remote and manual data retrieval;</del></i> | <i>a. <del>The meter shall have a mass memory capable of recording the 5-minute required demand interval data for a period of at least 60 days and have communication ports for remote and manual data retrieval;</del></i> |
| <i>ba. ERC has tested/verified and sealed the meter;</i>  | <i>ba. ERC has tested/verified and sealed the meter;</i>  |

| Proposed Amendment (21 June 2019)   | RCC Agreement  |
|---|--|
| <p><b><u>b. All meters which are non-compliant to the mass memory requirements shall be replaced within six (6) months from the effectivity of registration in the WESM permitted to remain in service until they reach the end of their economic life;</u></b></p> <p><b><u>cd. All non-compliant instrument transformers shall be replaced within the period of two (2) years from the effectivity of registration in the WESM this version of WESM Manual on Metering.</u></b></p> <p>Continued non-compliance of metering installations shall be subject to sanctions or penalties.</p> | <p><b><u>b. All meters which are non-compliant to the mass memory requirements shall be replaced within six (6) months from the effectivity of registration in the WESM permitted to remain in service until when they become defective or until they reach the end of their economic life;</u></b></p> <p><b><u>cd. All non-compliant instrument transformers shall be replaced within the period of two (2) years from the effectivity of registration in the WESM this version of WESM Manual on Metering.</u></b></p> <p>Continued non-compliance of metering installations shall be subject to <b><u>applicable</u></b> sanctions or penalties.</p> |

• Section 5.3.2 (b) Daily Process

The provision was agreed to be revised for clarity.

| Proposed Amendment  | RCC Agreement  |
|---|--|
| <p><b>Daily Process</b></p> <p><b><u>b. All collected meter data shall be submitted by the Metering Services Provider to the Market Operator's Meter Data Warehouse on or before starting 0400H until to 0800H of the succeeding trading day. However, for metering facilities with failed communication, the Metering Service Provider can attempt for remote meter data retrieval and submit to the Market Operator not later than 1200H of the same day. The Metering Services Provider shall not make, cause or allow any alteration to the original stored meter data as retrieved in the metering installation.</u></b></p> | <p><b>Daily Process</b></p> <p><b><u>c. All collected meter data shall be submitted by the Metering Services Provider to the Market Operator's Meter Data Warehouse on or before starting 0400H until to 0800H of the succeeding trading day. However, for metering facilities with failed communication capability, the Metering Service Provider can shall attempt remote meter data retrieval and submit to the Market Operator not later than 1200H of the same day. The Metering Services Provider shall not make, cause or allow any alteration to the original stored meter data as retrieved in the metering installation.</u></b></p> |

• Section 7.3.2 (b) Late Resolution

NGCP proposed to revise the deadline for late resolutions to be reflected in the final settlement from **two (2) working days** to **four (4) working days** as coordinated with the Market Operator.

Minor and clerical revisions were likewise introduced on certain provision and in the rationale portions and were adopted accordingly.

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| Agenda   | Presenter   | Action/s Taken      |
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| 5.3. Draft RCC Resolution No. 2019-11: Approval of Proposed Amendments to the Market Manual on Procedures for Monitoring of Forecast Accuracy Standards for Must-Dispatch Generating Units | Secretariat | Approved as revised |

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119 On the concerns of the RCC regarding the length of transition period, the RCC agreed  
120 to reflect in its resolution, the recommended one (1) year transition period wherein no  
121 penalties shall be given to Must-Dispatch Generating Units.

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123 There being no other matters left for discussion, the RCC approved resolution no.  
124 2019-11, as revised.

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| VI. Other Matters   |             |                  |
|---|-------------|------------------|
| Agenda  | Presenter   | Action/s Taken   |
| 6.1. PEM Board Meetings<br>a. BRC – 22 July 2019<br>a. PEM Board – 31 July 2019 | Secretariat | Noted by the RCC |

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128 The RCC Independent Members agreed that Dr. Nerves will present during the PEM  
129 Board meeting on 31 July 2019.

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131 For the presentation to the BRC, the task was delegated to PEMC in the RCC's stead.

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| Agenda  | Presenter   | Action/s Taken   |
|---|-------------|------------------|
| 6.2. DOE Letter: Disapproval of Proposed Amendments to Introduce Wholesale Electricity Market Trader (WENT) | Secretariat | Noted by the RCC |

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135 Mr. John Mark S. Catriz informed the RCC that the proposed amendments to introduce  
136 WENT in the WESM have been disapproved by the DOE due to the following reasons:



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1. It is not clear which sector is being represented by WEMT;

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2. There is no sufficient justification for including WEMT as WESM Member;

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3. WEMT responsibilities are not clear;

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4. Possible exposure of the WESM to gaming; and

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5. Compromise transparency and efficiency in the WESM.

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There being no other concerns, the RCC noted the information.

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| Agenda                               | Presenter   | Action/s Taken   |
|--------------------------------------|-------------|------------------|
| 6.3. RCC Members with Expiring Terms | Secretariat | Noted by the RCC |

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The Secretariat presented the list of RCC members with expiring terms for 2019. The

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RCC noted that the Board Selection Committee will convene in the following week to

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discuss on the matter. Letters will be sent out to involved individuals and sectors

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regarding the decision of the Board Selection Committee.

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| Agenda            | Presenter   | Action/s Taken  |
|-------------------|-------------|---|
| VII. Next Meeting | Secretariat | The RCC noted the following of the next RCC meetings: <ul style="list-style-type: none"> <li>August 23</li> <li>September 20</li> <li>October 18</li> </ul> |
| VIII. Adjournment |             | The RCC meeting was adjourned at around 11:00AM   |



Prepared by:

[REDACTED]

**Aldjon Kenneth M. Yap**

Specialist

Market Assessment Group – Rules Review Division

Reviewed by:

[REDACTED]

**John Mark S. Catriz**

Manager

Market Assessment Group – Rules Review Division

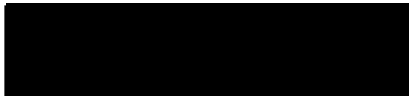



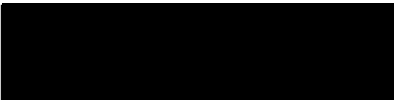



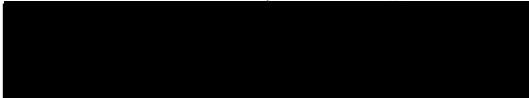



Noted by:



[REDACTED]

**Elaine D. Gonzales**

Acting Head

Market Assessment Group

|  |  |
|--|--|
| Approved by:<br><b>THE RULES CHANGE COMMITTEE</b>  |  |
| Independent Members:   |  |
| <br><b>Maila Lourdes G. de Castro</b><br>Chairperson                                      | <br><b>Francisco L.R. Castro, Jr.</b>  |
| <br><b>Allan C. Nerves</b>  | <br><b>Concepcion I. Tanglao</b>   |
| Generation Sector Members:   |  |
| <br><b>Dixie Anthony R. Banzon</b><br>Masinloc Power Partners Co. Ltd.<br>(MPPCL)         | <br><b>Abner B. Tolentino</b><br>Power Sector Assets and Liabilities<br>Management Corporation (PSALM) |
| <b>Jose Ildebrando B. Ambrosio</b><br>NorthWind Power Development Corp.<br>(NorthWind)   | <br><b>Cherry A. Javier</b><br>Aboitiz Power Corp.<br>(APC)  |
| Distribution Sector Members:   |  |
| <br><b>Virgilio C. Fortich, Jr.</b><br>Cebu III Electric Cooperative, Inc.<br>(CEBECO3) | <br><b>Ryan S. Morales</b><br>Manila Electric Company<br>(MERALCO)                                   |
| <br><b>Ricardo G. Gumalal</b><br>Iligan Light and Power, Inc.<br>(ILPI)                 | <br><b>Jose P. Santos</b><br>Ilocos Norte Electric Cooperative, Inc.<br>(INEC)                       |
| Supply Sector Member:  |  |
| <br><b>Loretto H. Rivera</b><br>TeaM (Philippines) Energy Corporation<br>(TPEC)        |  |

|   |  |
|---|--|
| Market Operator Member:   |  |
| <br><b>Isidro E. Cacho, Jr.</b><br>Independent Electricity Market Operator of the Philippines<br>(IEMOP) |  |
| System Operator Member:   |  |
| <br><b>Ambrocio R. Rosales</b><br>National Grid Corporation of the Philippines<br>(NGCP)                |  |

**DELIBERATION ON PROPOSED AMENDMENTS TO THE WESM RULES PROVIDING FOR THE IMPLEMENTATION OF A WESM COMPLIANCE OFFICER ACCREDITATION PROGRAM**

| Title              | Sec. No. | Current WESM Rules   | Proposed WESM Rules based on previous submissions to the DOE <sup>1</sup>  | Further Amendments to the Proposed/ Current WESM Rules   | Rationale/ Comments   | Comment(s)   | Proposed Revised Wording | Proponent's Response  | RCC Agreements  |
|--------------------|----------|--|--|--|---|--|--------------------------|---|---|
| Scope of Chapter 7 | 7.1      | <p>In line with the principles of self-governance, expeditious, just and least expensive disposition of disputes and considering the continuous nature of the transactions and operations of the WESM, this chapter sets out:</p> <p>(a) The responsibilities for ensuring that all WESM members comply with the WESM Rules;</p> <p>(b) The procedures on how the alleged breaches will be dealt with including:</p> <p>(1) The correct party to whom notice of an alleged breach of the WESM Rules by a WESM member shall be given;</p> <p>(2) The manner in which an alleged breach is to be investigated;</p> | <p>In line with the principles of self-governance, expeditious, just and least expensive disposition of disputes and breaches of the WESM Rules or Market Manuals and considering the continuous nature of the transactions and operations of the WESM, this chapter sets out:</p> <p>(a) The responsibilities for ensuring that all WESM Members comply with the WESM Rules;</p> <p>(b) The process for enforcement of the WESM Rules and Market Manuals including:</p> <p>(i) The procedures and responsibilities for carrying out enforcement proceedings, including the monitoring of compliance with the WESM Rules and Market Manuals, investigation of probable breach, and</p> | <p>In line with the principles of self-governance, expeditious, just and least expensive disposition of disputes and breaches of the WESM Rules or Market Manuals and considering the continuous nature of the transactions and operations of the WESM, this chapter sets out:</p> <p>(a) The responsibilities for ensuring that all WESM Members comply with the WESM Rules;</p> <p>(b) The process for enforcement of the WESM Rules and Market Manuals including:</p> <p>(i) The procedures and responsibilities for carrying out enforcement proceedings, including the monitoring of compliance with the WESM Rules and Market Manuals, investigation of probable breach, and</p> | <p>Propose to include in the scope of the Chapter 7 the process for the accreditation of WCOs under the proposed WCO Accreditation Program.</p> | <p><b>SPC and SIPC Comments</b></p> <p>1. Although the WESM Compliance Officer (WCO) refers to a point person of a Trading Participant, the WCO credentials in the Accreditation Program should merit the Trading Participant it represents. Thus, in a situation when the WCO leaves his/her company during the accreditation program, the new WCO appointed by the company should gain/inherit the merits/points of the former WCO. The former and new WCO should have proper turn-over in relation to the WCO accreditation program and the respective compliances in the WESM.</p> |                          | <p><b>SPC and SIPC</b></p> <p>1. PEMC does not agree that the WCO credentials gained by the WCO during the accreditation process, in case the WCO leaves the company, should be gained /inherited by the company. A WCO who is WCO-accredited ensures that the company which he is under employment will gain from his accreditation through the continuing learning afforded in such a program. The accreditation attaches to the person, not to the organization. To mean otherwise would run counter to the intention of the accreditation, <i>i.e.</i>, to attain a higher level of compliance by the organization <u>through its WCO</u>. Even if the outgoing WCO turns over his responsibilities to the new WCO, there is no</p> | <p>On the turnover of WCO responsibility to a new WCO appointed by a certain Trading Participant, Dr. Allan C. Nerves inquired if there is a specified timeline in the proposal. Ms. Geraldine A. Rodriguez explained that these matters depend on the internal procedures of concerned Trading Participant. She further added that if matters like this are to be considered, it will not be reflected in the WESM Rules but rather in the guidelines for WCO accreditation to be drafted in consultation with the WCOs.</p> <p>Said guidelines would include all the fees, programs (specific for each type of Trading Participants), seminars, merits and other necessary things that should be specified for the WCO accreditation.</p> <p>Ms. Lorreto H. Rivera inquired about the difference between the currently appointed WCO with the proposed WCO accreditation program. She</p> |

<sup>1</sup> Based on RCC Resolutions 2018- 06 (Annex A) and 2018-02 Annex B) ; Unless otherwise proposed to be amended, previous proposed amendments under Resolutions 2018-01 and 2018-06 already submitted to DOE are proposed to be adopted as recommended.



| Title | Sec. No. | Current WESM Rules   | Proposed WESM Rules based on previous submissions to the DOE <sup>1</sup>  | Further Amendments to the Proposed/ Current WESM Rules  | Rationale/ Comments | Comment(s) | Proposed Revised Wording | Proponent's Response   | RCC Agreements  |
|-------|----------|--|--|---|---------------------|------------|--------------------------|--|---|
|       |          | <p>(3) The manner in which a breach is to be sanctioned;</p> <p>(c) Other provisions on how disputes are to be resolved; and</p> <p>(d) The appointment of an Enforcement and Compliance Officer, a Dispute Resolution Administrator and selection of mediators and arbitrators that shall form part of the arbitration panel.</p> | <p>probable breach, and imposition of sanctions; and</p> <p>(ii) the enforcement actions that can be taken as consequences of a breach, and the procedures and</p> <p>(c) Other provisions on how disputes are to be resolved; and</p> <p>(d) The appointment of an Enforcement and Compliance Officer, a Dispute Resolution Administrator and selection of mediators and arbitrators that shall form part of the arbitration panel.</p> | <p>imposition of sanctions; and</p> <p>(ii) the enforcement actions that can be taken as consequences of a breach, and the procedures and responsibilities for imposing and implementing the same;</p> <p>(c) Other provisions on how disputes are to be resolved; <b>and</b></p> <p>(d) The appointment of an Enforcement and Compliance Officer, a Dispute Resolution Administrator and selection of mediators and arbitrators that shall form part of the arbitration panel; and</p> <p><b><u>(e) The designation and accreditation of the WESM Compliance Officers.</u></b></p> |                     |            |                          | <p>assurance that whatever the outgoing WCO learned through the accreditation program will be imparted to the new WCO. It is to the WESM Member's advantage to ensure that he always has a <b>WCO Accreditation.</b></p> | <p>stated that currently WCO are being trained and updated of new compliance required by the WESM. She inquired if there is a possibility of retaining what is in place due to concerns on the cost that the program would incur. Ms. Rodriguez stated that this is to address concerns of Trading Participants who are not fully aware of their obligations which causes them to incur breaches and penalties. She added that with this program in place, non-compliances may be filtered.</p> <p>Atty. Maila Lourdes G. De Castro asked on the probable costing of these programs. Ms. Rodriguez stated that it is yet to be established but it is more likely that the prices will be the same with that of WESM trainings provided by the Market Operator which is at around five thousand pesos (Php 5,000) per head for a two (2)-day training.</p> <p>Mr. Virgilio C. Fortich, Jr. then suggested adopting the SPC's comment, to which Ms. Rodriguez reiterated that the knowledge gained by the person that completed the WCO program is deemed to be</p> |

| Title | Sec. No. | Current WESM Rules | Proposed WESM Rules based on previous submissions to the DOE <sup>1</sup> | Further Amendments to the Proposed/ Current WESM Rules | Rationale/ Comments | Comment(s) | Proposed Revised Wording | Proponent’s Response | RCC Agreements  |
|-------|----------|--------------------|---|--|---------------------|------------|--------------------------|----------------------|---|
|       |          |                    |   |  |                     |            |                          |                      | <p>non-transferrable. Mr. Fortich then requested to see the program first to be assessed by Trading Participants. Ms. Rodriguez stated these programs are yet to be established by the accreditation panel.</p> <p>Ms. Cherry A. Javier inquired if there will be penalties in case that the accredited WESM Compliance Officer resigns from the company. Ms. Rodriguez clarified that for now, , penalties will not be imposed to a trading participant until an accredited WESM Compliance Officer is hired. Ms. Rivera expressed that matters that will have financial impact on the trading participants should be well clarified in the proposal. Ms. Rodriguez stated that these matters will be included in the guidelines. Mr. Abner B. Tolentino, on the other hand, suggested to have an alternate WESM Compliance Officer, one for the operation side and one for the trading side. Ms. Concepcion I. Tanglao commented that having two (2) compliance officers can be the decision of the company. Ms. Rodriguez clarified that other trading participants appoints a</p> |

| Title | Sec. No. | Current WESM Rules | Proposed WESM Rules based on previous submissions to the DOE <sup>1</sup> | Further Amendments to the Proposed/ Current WESM Rules | Rationale/ Comments | Comment(s)   | Proposed Revised Wording | Proponent's Response  | RCC Agreements   |
|-------|----------|--------------------|---|--|---------------------|--|--------------------------|---|--|
|       |          |                    |   |  |                     | <p>2. Once the WCO was accredited it also follows that company/trading participant it represents is accredited. Thus, the company/trading participant have greater prestige/privilege than the unaccredited trading participant.</p> <p>(add as response re recognition)</p> |                          | <p>2. A company being accredited means it meets certain standards required by accreditation bodies. A company being certified, say for example, ISO 9001 Certified means an organization has met the requirement in the ISO 9001 Quality Management System (QMS). In the <b>WCO</b> Accreditation Program, there is nothing for the company to be certified or accredited for. The advantage that the WESM Member gets from ensuring that its WCO is accredited is the assurance that the WCO is informed about latest updates in the market by way of continuing learning programs offered by the proposed</p> | <p>WESM Enforcement Officer instead of having two (2) WESM Compliance Officers. Mr. Tolentino then suggested to revise item (e) to cover optional accreditation for WESM Enforcement Officers.</p> <p>Atty. De Castro inquired if there are certificates given to accredited trading participants. Ms. Rodriguez stated that due recognitions are given to compliant trading participants. Atty. De Castro then suggested to include said recognitions to the responses to comments.</p> |

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|-------|----------|--------------------|---|--|---------------------|---|--------------------------|---|----------------|
|       |          |                    |   |  |                     | 3. The Accreditation Certificate should be issued to the company/trading participant that the WCO represents. The Accreditation Certificate |                          | <p>WESM Accreditation Body.</p> <p>The implementing manual (<i>consultation with the WCOs is ongoing</i>) can include a mechanism wherein the WCO who is accredited under the program shall carry with him the accreditation even if he transfers to another organization to the extent that it becomes significant to the organization to which he transfers.</p> <p>The Accreditation Certificate is given to the WCO and not to the WESM Member given the reasons cited above. The validity of the certification is being discussed at the level of the guidelines for the WCO Accreditation Program.</p> <p>3. The suggestion is accepted. One of the WCO Accreditation Body's tasks is to ensure that the programs it offers will minimize non-compliance. In this</p> |                |



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|       |          |                    |   |  |                     | <p>shall be valid for a period of three (3) years.</p> <p>4. To guide all the WESM participants (Generators, Distribution Utilities, Electric Cooperatives, etc.) in complying with the WESM Rules and all WESM Manuals, we suggest that PEMC/IEMOP create a tabulation/matrix of compliance/submission plan and its corresponding deadline found in the WESM Rules and all WESM Manual which is not limited to Compliance with the Must Offer Rule and Real Time Dispatch Instructions. The matrix should specify its description, the corresponding Title/Section in WESM Rules or WESM Manual, etc.</p> |                          | <p>regard, lecture programs will need to consider laying out such obligations and planning offers to address the need to impart such information to concerned WESM Members.</p> <p>4. The draft implementing manual (consultation with WCOs is ongoing) includes a proposal wherein the Accreditation Body, if appropriate, can determine and authorize the publication of the lectures or courses to be offered for the entire compliance period, with timeline, credit points to be earned, etc.</p> | <p>Atty. De Castro inquired on the foreseen contents of the guidelines. Ms. Rodriguez explained that all matters involving and affecting trading participants shall be reflected in the said guidelines. Meanwhile, procedures that concerns PEMC-ECO will be reflected in the internal business procedures of the department.</p> |

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|---|--|--|---|---|--|---|--------------------------|--|----------------|--|--------------------|--|--|--|-----------------------|--|--|--|---|--|--|--|---|--|--|--|---|--|--|--|--|--|--|--|--|--|--|
|   |  |  |   |   |  | <p>The sample of the tabulation/matrix can be the following:</p> <div><div>+</div><table><thead><tr><th>Description</th><th>Reference (Title/Section in WESM Rules or WESM Manual)</th><th>Deadline</th><th>Consequences of not Meeting the Deadline</th></tr></thead><tbody><tr><td>1. Must Offer Rule</td><td></td><td></td><td></td></tr><tr><td>2. Real Time Dispatch</td><td></td><td></td><td></td></tr><tr><td>3. Timeline for submission of the discrepancy of the Verification of Must-Run Unit (MRU) Data</td><td></td><td></td><td></td></tr><tr><td>4. Timeline for Filing of Additional Claims for Must-Run Unit</td><td></td><td></td><td></td></tr><tr><td>5. Timeline for Filing of Additional Claims for Administered Prices</td><td></td><td></td><td></td></tr><tr><td>6. Etc./Other Reportorial requirements</td><td></td><td></td><td></td></tr></tbody></table></div> | Description              | Reference (Title/Section in WESM Rules or WESM Manual)   | Deadline       | Consequences of not Meeting the Deadline | 1. Must Offer Rule |  |  |  | 2. Real Time Dispatch |  |  |  | 3. Timeline for submission of the discrepancy of the Verification of Must-Run Unit (MRU) Data |  |  |  | 4. Timeline for Filing of Additional Claims for Must-Run Unit |  |  |  | 5. Timeline for Filing of Additional Claims for Administered Prices |  |  |  | 6. Etc./Other Reportorial requirements |  |  |  |  |  |  |
| Description   | Reference (Title/Section in WESM Rules or WESM Manual) | Deadline   | Consequences of not Meeting the Deadline  |   |  |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
| 1. Must Offer Rule  |  |  |   |   |  |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
| 2. Real Time Dispatch   |  |  |   |   |  |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
| 3. Timeline for submission of the discrepancy of the Verification of Must-Run Unit (MRU) Data |  |  |   |   |  |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
| 4. Timeline for Filing of Additional Claims for Must-Run Unit                                 |  |  |   |   |  |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
| 5. Timeline for Filing of Additional Claims for Administered Prices                           |  |  |   |   |  |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
| 6. Etc./Other Reportorial requirements  |  |  |   |   |  |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
| ENFORCEMENT   | 7.2  |  |   |   |  |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
|   |  | 7.2.9. Designation of a Compliance Officer for WESM Member, Market Operator and System Operator  | 7.2.9 Designation of a Compliance Officer for WESM Member, Market Operator and System Operator  | 7.2.9 Designation <b>and Accreditation</b> of a Compliance Officer for WESM Member, Market Operator and System Operator   | To extend the scope of this Section to accreditation of WESM Compliance Officers |   |                          |  |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |
|   |  | 7.2.9.1 Each WESM Member, the Market Operator, the System Operator, Metering Service Provider and any other WESM Service Providers shall designate a Compliance Officer in their respective organizations. | 7.2.9.1 All WESM Members, and the Market Operator shall designate a WESM Compliance Officer in their respective organizations; Provided that the person so appointed should have an understanding of the WESM | 7.2.9.1 All WESM Members, and the Market Operator shall designate a WESM Compliance Officer in their respective organizations; Provided that the person so appointed should have an understanding of the WESM | Recommends that:<br><br>(a) the accreditation be mandatory for all               | <b>Aboitiz Power Corporation</b><br><br>We suggest that the Accreditation Body shall be composed of independent representatives from the Power/Energy industry stakeholders to ensure that  |                          | <b>Aboitiz Power Corporation</b><br><br>Agree. It is the intent of this proposal to have the WCO Accreditation Body be composed of independent individuals so that they shall provide the needed |                |  |                    |  |  |  |                       |  |  |  |   |  |  |  |   |  |  |  |   |  |  |  |  |  |  |  |  |  |  |

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|       |          |                    | <p>compliance requirements of his or her organization, and occupies a senior management position in the organization that he or she is able to recognize possible non-compliances and has sufficient authority to resolve the same.</p> | <p>compliance requirements of his or her organization, and occupies a senior management position in the organization that he or she is able to recognize possible non-compliances and has sufficient authority to resolve the same. <b><u>Furthermore, said WESM Compliance Officer shall undergo an accreditation program to be administered by PEMC.</u></b></p> <p><b><u>For this purpose, PEMC shall:</u></b></p> <p><b><u>(a) In consultation with the WESM Members and the Market Operator, develop and establish the necessary program and guidelines for the accreditation of the WESM Compliance Officers with the end in view of attaining a higher level of compliance with their obligations in the WESM and keeping them informed of their company's obligations in the market and any market developments.</u></b></p> | <p>WESM Compliance Officers to achieve a high degree of compliance and thus avoid the cost of non-compliance; and</p> <p>(b) PEMC develops a detailed program for accreditation; and</p> <p>(c) PEMC creates an Accreditation Body for this purpose.</p> | <p>the programs that this body would be implementing are impartial in nature.</p> <p>How many seats are there in this Accreditation Body? We suggest that the same should be defined in the WESM Rules.</p> <p>What are the qualifications of the members of accreditation body? We also suggest that the same should be defined in whatever WESM Manual in line with proposed provisions.</p> |                          | <p>impartiality for the responsibilities that they shall handle.</p> <p>Following the manner it was done in the other committees such as the Market Surveillance Committee (MSC), Technical Committee (TC), the number of seats and the qualifications for the Accreditation Body shall be indicated in the appropriate Manual.</p> <p>For this purpose, PEMC shall:</p> <p><b>(a)</b> In consultation with the <i>WESM Members</i> and the <i>Market Operator</i>, develop and establish the necessary program and guidelines for the accreditation of the WESM Compliance Officers with the end in view of attaining a higher level of compliance with their obligations in the WESM and keeping them informed of their company's obligations in the market and any market developments.</p> |                |

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|       |          |                    |   | (b) <u>Create an Accreditation Body who shall be responsible for implementing an accreditation program for all WESM Compliance Officers, recommending or establishing the competency standards, and accrediting or reviewing the compliance of all WESM Compliance Officers with the accreditation program referred to in the preceding paragraph.</u> |                     | <p><b>TeaM Energy</b></p> <p>In as much as we fully support measures aimed at improving compliance among</p> |                          | <p>b) Create an Accreditation Body, <b><u>composed of members independent of the Philippine electric power industry and the Government and in such number and with such skills and expertise deemed necessary</u></b> who shall be responsible for <del>that shall</del> <b><u>the following:</u></b></p> <p><b>i)</b> implementing an accreditation program for all WESM Compliance Officers;</p> <p><b>ii)</b> recommending or establishing the competency standards; <del>and</del></p> <p><b>iii)</b> accrediting or reviewing the compliance of all WESM Compliance Officers with the accreditation program referred to in the preceding paragraph.</p> <p><b>TeaM Energy</b></p> <p>The PEMC –ECO in its review of the non-compliances of Generators, beginning the</p> | <p>Atty. De Castro inquired on how the competence of WESM members is measured. Ms.</p> |



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|       |          |                    |   |  |                     | <p>participants, we first need to understand the clear link between imposing any additional requirements and how it will contribute to enhanced compliance.</p> <p>The purpose for pushing for this amendment to include an accreditation program for compliance officers is to address/minimize the non-compliance of generator trading participants.</p> <p>In the Discussion Paper, it is stated that, "(o)ver the years, despite the designation of WESM Compliance Officers, it has been observed that the non-compliances of Generator Trading Participants have not decreased. In the past 13 years, 28 generator participants with a total of 31 power plants have been found to be in breach of these specific WESM Rules, with financial penalties amounting to as high as 75 Million Pesos."</p> <p>There is a need to know the bases for these non-compliance events, whether it is related/connected to the</p> |                          | <p>October 2018 billing period has noted that most of the reasons for breaches of some WESM Members (generators) were due to lack of competence/knowledge of the compliance officer/WESM Member on their obligations in the market and what may be considered as justifiable reasons for non-compliances. By having the WESM Members know their obligations and what may be considered acceptable reasons for non-compliances will result to less number of intervals being flagged for non-compliance and later being called out as breach. This is the rationale for the proposal for a WCO Accreditation Program.</p> <p>Moreover, the accreditation is not only directed towards compliance with the current obligation under the existing rules. The pace of change is probably faster than it has ever been – especially with the new system, new investors and types of resources coming in the market, etc. It must also be able to keep the WCOs updated of the changes in the</p> | <p>Rodriguez explained that PEMC-ECO was able to confirm that some trading participants seem to lack knowledge on basic responsibilities and obligations with the current transactions monitored by the PEMC-ECO.</p> <p>Ms. Rivera referred to the comments of TeaM Energy wherein she highlighted that with the discussion paper of the proposed amendments, the designation of a WESM Compliance Officer did not seem to aid in improving the performance of some trading participants. She added that it would not really matter if the WESM Compliance Officer is accredited or not when the problem lies on the technical side of the generating plants. She reiterated that the proposed accreditation will result to added costs to the trading participants. Atty. Hazel M. Gubaton-Lopez informed the RCC that the discussion may not have covered all of the concerns but during the conferences undertaken by PEMC-ECO with trading participants, it was found out that the interpretation of the WESM Rules varies among the</p> |

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|       |          |                    |   |  |                     | <p>lack of competence/knowledge of the compliance officer, and whether adopting an accreditation system would in fact resolve future non-compliance.</p> <p>We need to ask to what extent these episodes of non-compliance would have been avoided if the compliance officer had more knowledge or training. If there is no established relationship, then we see no clear reason for the adoption of an accreditation system. Or if only a small percentage is related, would it be worthwhile to divert resources for a slight/negligible improvement in governance. or maybe it would be better to look for other measures which would prove to be more effective at addressing non-compliance?</p> <p>If the cause for non-compliance is technical/operational, we submit that no amount of training would make the generator participant compliant. We thus need to find the nexus, the relationship between non-</p> |                          | <p>obligations or new sets of obligations which may be created through laws, rules, and other issuances that govern the market. It would help the WCOs maintain and enhance his/her knowledge and compliance skills to deliver a professional service and make meaningful contribution to his/her organization and to the WESM.</p> | <p>participants. This accreditation program would likewise continually inform WESM Compliance and Enforcement Officers with the new issuances of the DOE. The most drastic change with regard to compliance will be the shift from the current one (1)-hour dispatch interval to the five (5)-minute dispatch interval.</p> |

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|       |          |                    |   |  |                     | <p>compliance and whether it can be attributed to the compliance officer's lack of training.</p> <p>Finally, to discourage non-compliance, there are already set financial penalties which should be deemed sufficient disincentive on the part of generators. It is already in their interest to comply to avoid being penalized.</p> <p>Moreover, it is difficult to comment on the accreditation process and agree in principle considering that the details are yet to be finalized.</p> <p>Hence, the need to carefully evaluate the clear need for adopting an accreditation program. Otherwise this would merely add an unnecessary layer and monitoring, the burden and expense of which would be shouldered by compliance officers, generators and PEMC.</p> <p>We support training programs that would improve knowledge and competencies of compliance officers but we have reservations in making it</p> |                          |                      |                |

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|       |          |  |  |  |  | mandatory, and that we do not need see the clear need in adopting an accreditation process.  |                          |   |                |
|       |          | <p>7.2.9.2 The Compliance Officer shall: (a) Monitor and undertake necessary activities to ensure the full compliance of their respective organization to the EPIRA, the EPIRA Implementing Rules and Regulations, WESM Rules, and the WESM Market Manuals; and develop necessary procedures and guidelines for this purpose.</p> <p>(b) From time to time, if the Compliance Officer deems it necessary or appropriate, propose policies or amendments to the WESM Rules and/or WESM Market Manuals to enhance or develop the WESM enforcement and compliance, with the objective of promoting good commercial and technical practices.</p> <p>(c) Be responsible in facilitating and coordinating with the WESM Enforcement Compliance Office (ECO), all matters relating to the</p> | <p>7.2.9.2 The WESM Compliance Officer shall: (a) Monitor the activities and transactions in the WESM of his or her organization and carry out measures to ensure compliance with the EPIRA, its Implementing Rules and Regulations, the WESM Rules and Market Manuals; and put in place necessary procedures and guidelines for this purpose;</p> <p>(b) From time to time and if he or she deems it necessary or appropriate, propose amendments to the WESM Rules and WESM Market Manuals to enhance or develop the WESM enforcement and compliance and to promote good commercial and technical practices;</p> <p>(c) Be responsible in coordinating with the Enforcement Compliance Office (ECO), on all matters relating to the WESM</p> | <p>7.2.9.2 The WESM Compliance Officer shall: (a) Monitor the activities and transactions in the WESM of his or her organization and carry out measures to ensure compliance with the EPIRA, its Implementing Rules and Regulations, the WESM Rules and Market Manuals; and put in place necessary procedures and guidelines for this purpose;</p> <p>(b) From time to time and if he or she deems it necessary or appropriate, propose amendments to the WESM Rules and WESM Market Manuals to enhance or develop the WESM enforcement and compliance and to promote good commercial and technical practices;</p> <p>(c) Be responsible in coordinating with the Enforcement Compliance Office (ECO), on all matters relating to the WESM</p> | <p>Recommends that the accreditation be mandatory for all WESM Compliance Officers to achieve a high degree of compliance and thus avoid the cost of non-compliance.</p> | <p><b>Aboitiz Power Corporation</b></p> <p>Referring to paragraph (e), for how many years are this accreditation valid for the WESM Compliance Officers?</p> |                          | <p><b>Aboitiz Power Corporation</b></p> <p>The accreditation is proposed to be valid for a period of one (1) year. Ongoing consultations with WCOs is currently ongoing and one of the matters commented on is the validity of the certification.</p> |                |



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|       |          | <p>enforcement and compliance of their respective organization, including the provision of the necessary information and data, as may be required by any of the WESM Governance Committees and by the ECO.</p> <p>(d) Submit a report to the ECO concerning their respective organization's compliance with WESM Rules and WESM Market Manuals on an annual basis or as may be determined by the ECO or any of the WESM Governance Committees.</p> | <p>enforcement, compliance and governance, including the provision of the necessary information and data, as may be required by any of the WESM Governance Committees and by the Enforcement and Compliance Office; and</p> <p>(d) Submit to the Enforcement and Compliance Office a report of his or her organization's compliance with WESM Rules and Market Manuals covering such period, but not less frequent than annually, and in such form as may be prescribed by the Enforcement and Compliance Office."</p> | <p>enforcement, compliance and governance, including the provision of the necessary information and data, as may be required by any of the WESM Governance Committees and by the Enforcement and Compliance Office; <del>and</del></p> <p>(d) Submit to the Enforcement and Compliance Office a report of his or her organization's compliance with WESM Rules and Market Manuals covering such period, but not less frequent than annually, and in such form as may be prescribed by the Enforcement and Compliance Office; <u>and</u></p> <p><u>(e) Undergo the accreditation process for WESM Compliance Officers.</u></p> |                     |            |                          |                      |                |