Annual Retail Market Assessment Report for 2024

26 December 2023 to 25 December 2024

March 2025

This Report is prepared by the
Philippine Electricity Market Corporation –
Market Assessment Group
and approved by the
Market Surveillance Committee

EXECUTIVE SUMMARY

The Annual Retail Market Assessment Report (ARMAR) 2024 provides an in-depth analysis of the performance and development of the Retail Competition and Open Access (RCOA) and the Green Energy Option Program (GEOP) in the Philippines. Covering the period from 26 December 2023 to 25 December 2024, the report examines market structure, competition, participant trends, and overall market performance.

Retail Competition and Open Access (RCOA)

Market participation in RCOA continued to grow in 2024, with a net increase of one hundred sixty-five (165) new Contestable Customers (CCs), bringing the total to 2,561 registered CCs, which accounts for 59% of all eligible end-users. The majority of these CCs were located in Luzon (87%), with Visayas (12%) and Mindanao (1%) following behind. Notably, Mindanao recorded its first CC registrations in 2024 after the commercial launch of RCOA in the region last 26 March 2024.

In terms of per Major Participant Group (MPG), competition remains concentrated, with the MERALCO and Aboitiz groups collectively holding over 50% of the CCs and total energy consumption. While some suppliers have started to capture more market shares, the overall level of market competition remains limited. In terms of total consumption in the RCOA, it grew by 18% compared to 2023, with peak demand observed in May, coinciding with seasonal weather changes and increased economic activity. One of the most significant benefits of RCOA participation in 2024 was cost savings, as retail electricity rates under RCOA remained 14% lower than Distribution Utility (DU) generation rates, on average. This resulted in a **PHP 16.76 billion in estimated savings for CCs**.

Customer switching activity also reflected a more stable market, with 248 instances of switching recorded. This posted a declined compared to 2023, suggesting that more customers are settling into long-term agreements with their suppliers. This reduced movement among suppliers indicates a maturing market with greater price stability and fewer disruptions.

Green Energy Option Program (GEOP)

The GEOP market experienced substantial growth in 2024, with a net increase of 229 new end-users, leading to a total of 515 registered participants, marking an 80% increase from 2023. The majority of these end-users were commercial customers (79%), with industrial users accounting for only 21%. Geographically, Luzon has the majority of GEOP End-Users equating to 82% of participants, while Visayas accounted for 18%. No GEOP end-users were recorded in Mindanao as of 2024.

One of the defining trends in the GEOP market was the increasing dominance of the Ayala Group, which expanded its market share from 38% in 2022 to 64% in 2024, making it the largest player in the program. While this growth highlights the strong adoption of renewable energy among its customers, it has also led to higher market concentration, reducing competition within the program. Total consumption under GEOP increased by 64% year-on-year, with steady growth throughout 2024 and peak consumption occurring in November and December.

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

General Note:

- Number of Contestable Customers (CC) and Green Energy Option Program (GEOP) End-Users – Based on Cumulative Count at the End of any given Year
- CCs and GEOP End-Users Consumption – Based on Total Consumptions for the whole Year

1. RETAIL COMPETITION AND OPEN ACCESS

This portion provides an assessment on the implementation of RCOA for the year 2024 (26 December 2023 to 25 December 2024), based on the monitoring indices set forth in the Catalogue of Retail Market Monitoring Data and Indices (CRMMDI) Issue 1.

1.1. MARKET STRUCTURE

The market structure indices were used to assess the number of participants, market share, and level of market concentration.

1.1.1. Number of Participants

1.1.1.1. Contestable Customers

For the year 2024, there were one hundred ninety-four (194) recorded initial switches[1] with one (1) CC that transferred from GEOP to RCOA, while having twenty-three (23) cessations and seven (7) CCs transferring from RCOA to GEOP, yielding to a net increase of one hundred sixty-five (165) additional participants in the market, demonstrating continuous increase on the figures of the previous years as shown in figure 1. A total of 2,561 CCs or about 59% of the entire population of eligible end-users[2] by the end of year 2024 have registered in the RCOA.

Additionally, 2024 saw an influx of newly registered CCs, which aligns with the increasing number of eligible end-users entering the RCOA. The growth can be attributed to the continuing growth in economic activity following its recovery from the COVID-19 pandemic, which resulted in more end-users to being eligible to participate in the program.

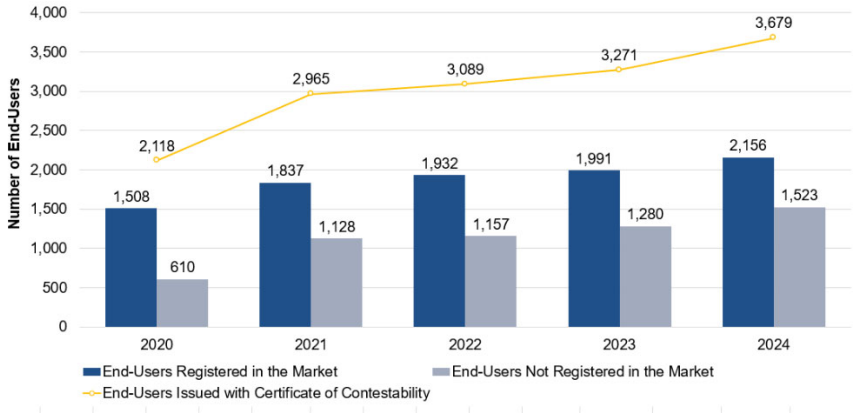

Figure 1. Cumulative Number of Eligible End-Users and CCs, 2020-2024

[1] Commercial transfer of Contestable Customer from the Distribution Utility as its supplier under regulated service to a Supplier.

[2] End-user that has met the eligibility threshold, as indicated by a single revenue meter and who has a choice to switch to the Retail Electricity Market.

1.1.1.2. Per Threshold

This section provides the annual breakdown of CCs based on contestability thresholds.

Based on figure 2, which presents the cumulative number of CCs per threshold from 2020 to 2024, the data indicates a steady increase in total CC registrations across all categories. CCs under 1MW & above holds the majority of the share for registered CCs since 2020.

In terms of thresholds, the 750-999kW range had the smallest share of the total increase in 2024, contributing approximately 10%. This trend has been observed since 2021. Additionally, there was a noticeable slowdown in the registration growth of CCs in the 1MW and above category during 2024 following a continuous increase from 2021 to 2023, as shown in figure 3. As a result, the 500-749kW category accounted for the highest number of new CCs entering RCOA during the reviewed period.

The continued growth in the 500-749kW threshold has nearly matched the number of CCs in the 750-999kW range. This increase suggests a rising trend of CCs with lower average peak demand actively exercising their power of choice, which may drive market expansion in the coming years.

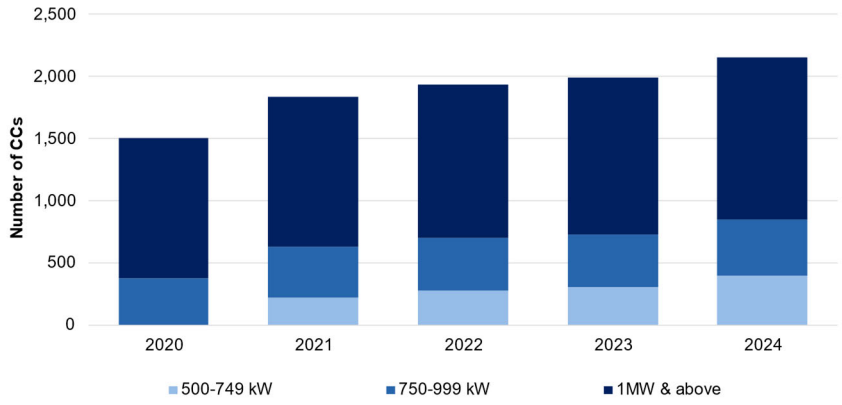

Figure 2. Cumulative Number of CCs per Threshold, 2020-2024

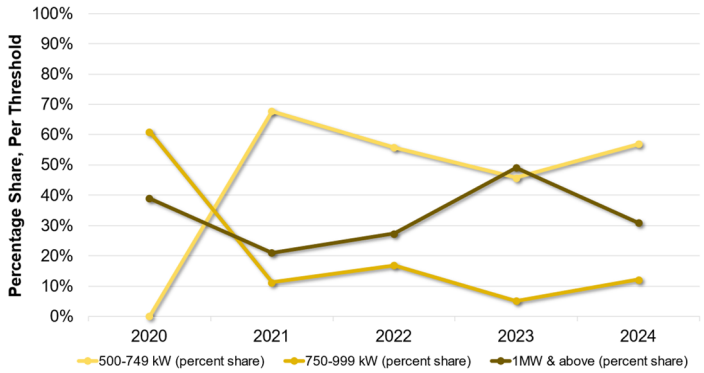

Figure 3. Percentage share of New Entrants per Threshold, 2020-2024

1.1.1.3. Per Location

In terms of geographical distribution, 87% or 1,867 CCs were situated in Luzon, with the remaining 12% or 262 located in Visayas, and 1% or 27 CCs in Mindanao, as depicted in figure 4.

The rate of CC growth is highest in Luzon, primarily due to the concentration of major economic hubs in the region. However, the slower pace of new CC registrations in Visayas suggests a need for enhanced awareness campaigns to encourage more eligible customers to participate in the RCOA program.

Meanwhile, Mindanao recorded its first 27 CCs following the commercial operation of RCOA in the region on 26 March 2024.

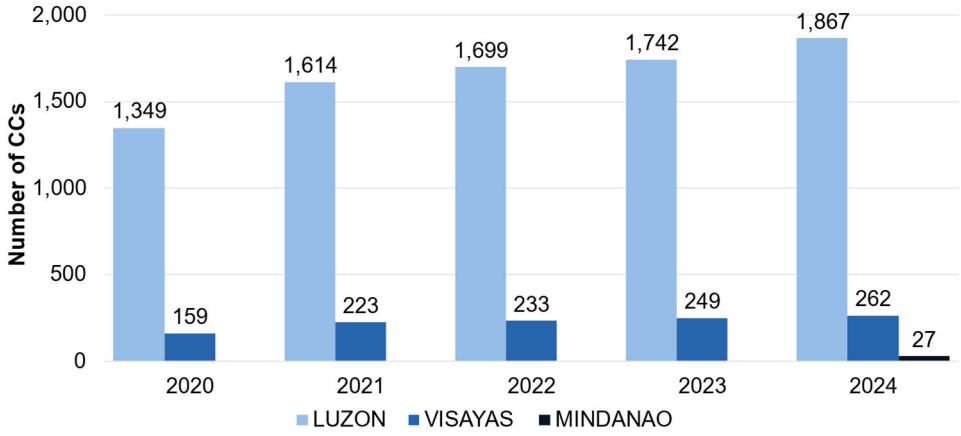

Figure 4. Cumulative Number of CCs Per Region, 2020-2024
Note: RCOA commercially operated in Mindanao on 26 March 2024 as per DOE DC No. 2024-03-0009

1.1.1.4. Per Retail Activity[3]

In terms of industry category, the number of new CCs entries from commercial and industrial CCs have shown a consistent pattern in preceding years. Commercial activities have maintained a steady percentage share of around 53%, while the remaining 47% were engaged in industrial activities.

[3] Retail activity is based on the available information provided under the specific business type, i.e. manufacturing, real estate, etc., in the IEMOP-Registration Data. If information is unavailable in the Registration Data, retail activity of the participant will be tagged based on the business description available online.

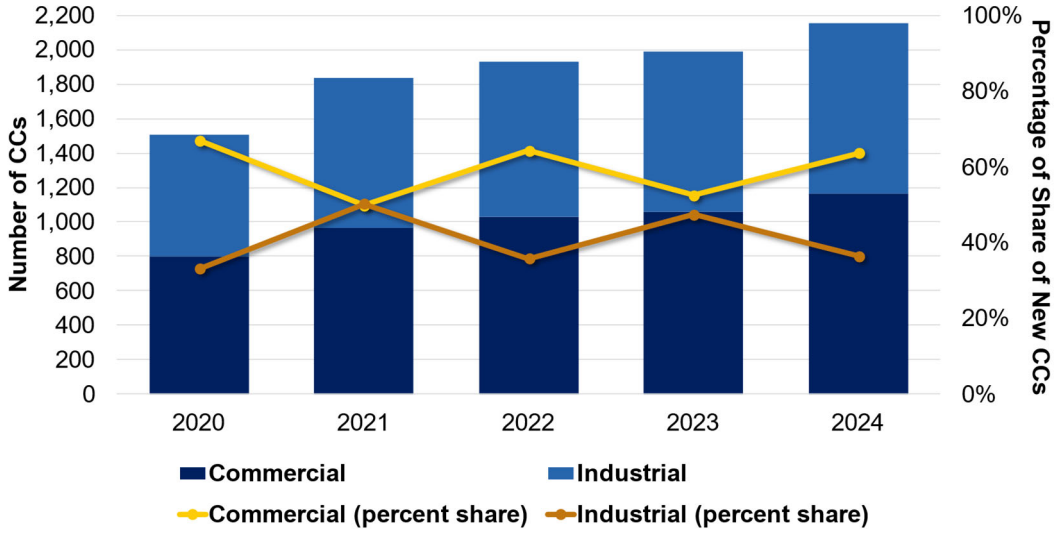

Figure 5. Cumulative Number of CCs Per Industry, 2020-2024

1.1.1.5. Average Consumption

With respect to energy consumption for CCs, figure 6 shows the breakdown on the level of consumption based on the average of hourly metered quantity (MQ) for the year 2024. About 67.67% of the registered CCs had average energy consumption of 1MWh and below. This is followed by customers that are in the above 1MWh to 5MWh average consumption taking about 28.42% of the population, while the remaining 3% were attributed to CCs with more than 5MWh of average consumption for the year.

Looking at the movement of their consumption per quarter, it can be observed in figure 7 that there was a decrease in CCs consuming 1MWh and below, while an increase was observed in CCs consuming between 1MWh and 5MWh during the 2nd quarter of 2024. This shift suggests that higher economic activity and elevated temperatures during the 2nd quarter contributed to the increased energy consumption. Conversely, the opposite trend was observed in the 4th quarter of 2024, where more CCs have lower consumption which is likely attributed to the holiday season, during which many businesses implemented holiday breaks, leading to reduced operations and lower energy demand.

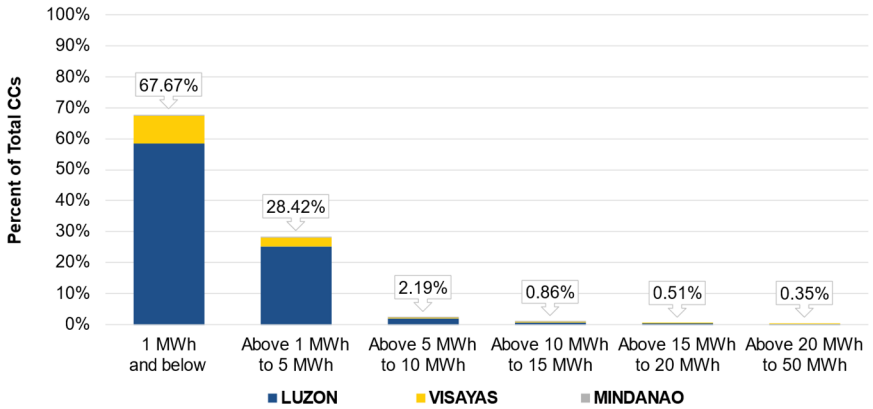

Figure 6. Distribution of CCs based on Average Energy Consumption, 2024

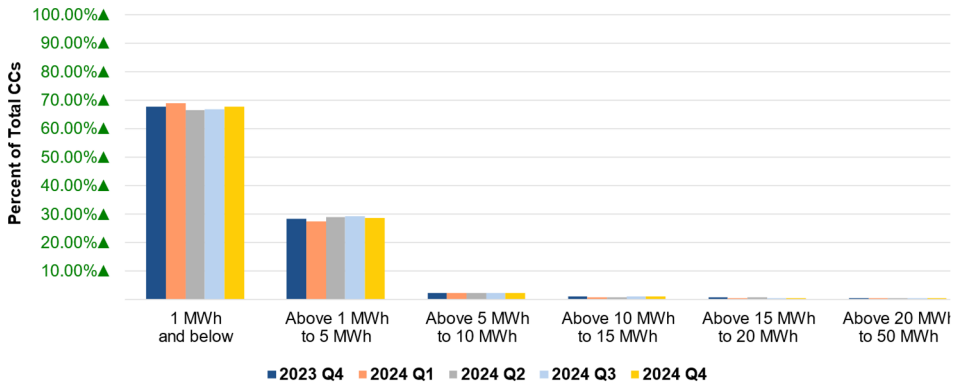

Figure 7. Distribution of CCs based on Average Energy Consumption, Q4 2023 - Q4 2024

1.1.1.6. Suppliers

Figure 8 shows the cumulative number of licensed suppliers vis-a-vis registered suppliers per category and the number of active suppliers, referring to those currently serving a registered CC. Majority of the registered Retail Electricity Suppliers (RES) were actively participating in the market and serving registered CCs.

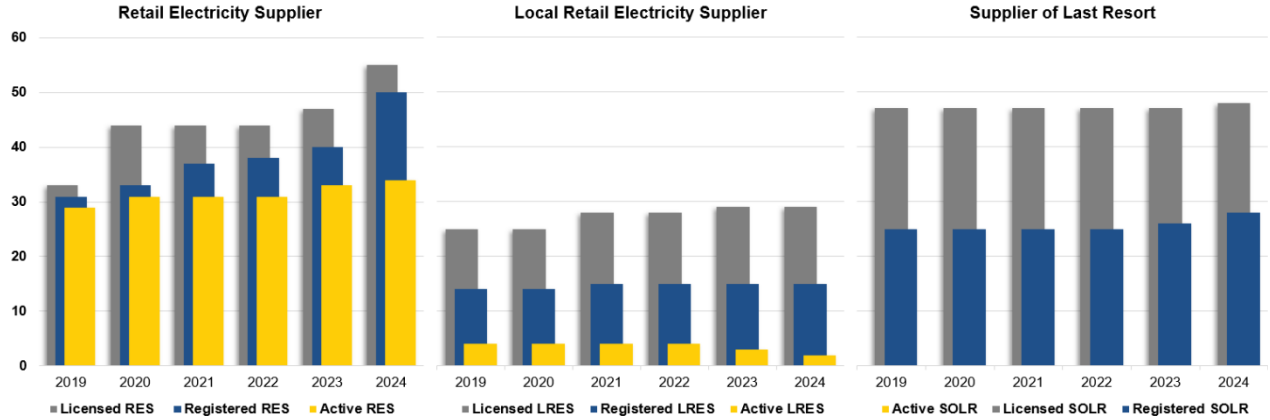

Figure 8. Number of Suppliers, 2019-2024

Note: The complete list of all registered Suppliers per category is provided in *Annex A. List of Suppliers Per Category, as of 31 December 2024*.

For 2024, the newly Registered Retail Electricity Supplier and Suppliers of Last Resort, are indicated in table 1.

Table 1. List of Newly Registered Suppliers in 2024

Retail Electricity Supplier	
Supplier Name	Date Registered
Alsons Power Supply Corporation	22 Mar 2024
Green Energy Supply Solutions, Inc.	15 Jul 2024
PrimeRES Energy Corporation	04 Aug 2024
ENERXIA Corporation	09 Sep 2024
MINERGY Retail Energy Solutions, Inc.	11 Oct 2024

EvoEnergi Inc.	20 Oct 2024
Hypergreen RES Energy Corporation	01 Nov 2024
Real Energy Corporation	07 Nov 2025
Sunny Side Up Power Corporation	23 Nov 2024
Alluma Energy Management Solutions, Inc.	13 Dec 2024

Supplier of Last Resort	
Supplier Name	Date Registered
Central Negros Electric Cooperative, Inc.	24 Jan 2024
Peninsula Electric Cooperative, Inc.	02 Jun 2024

1.2. MARKET SHARE

1.2.1. Supplier Share

1.2.1.1. In terms of Number of Contestable Customer and Consumption

Figure 9 shows the year-on-year comparison of Suppliers share per MPG[4] in terms of the number of CCs registered in the market as of the December billing period for each year.

On an annual review, it shows that MERALCO and the Aboitiz group continue to dominate the market, collectively holding more than 50% of the total CCs. Incremental increases were observed in the San Miguel group and the suppliers without MPG affiliation (Others) in 2024 while slight decreases were recorded for Aboitiz, EDC, and Ayala groups.

Despite minor fluctuations in the market share, the overall movement remains minimal, suggesting limited competition growth within the program. This stagnation reinforces the market dominance of MERALCO and Aboitiz.

[4] Based on Competitive Retail Electricity Market (CREM) Report ERC.

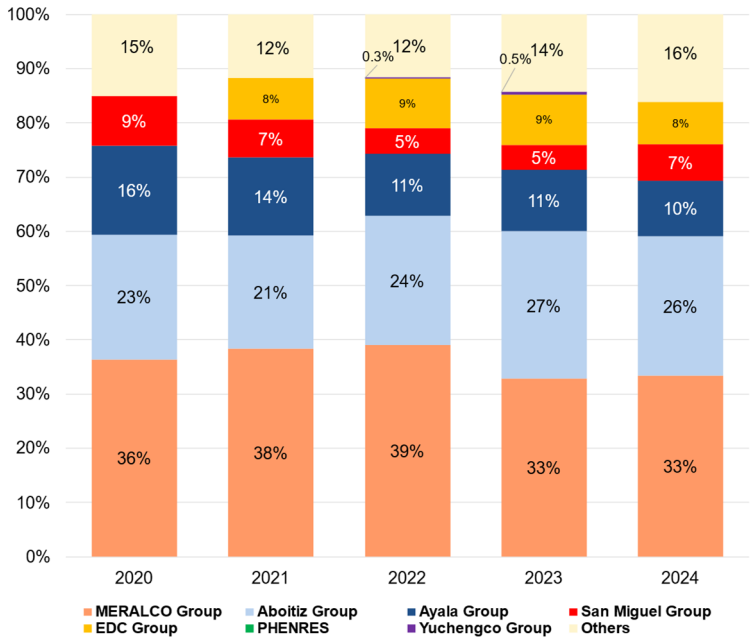

Figure 9. Share in Number of CCs Per Major Participant Grouping, 2020-20224

With regard to the market share based on energy consumption, figure 10 shows that in 2024, despite a 3% decline, the Aboitiz group still holds the largest market share at 28%, followed closely by the MERALCO group at 27% which is 3% lower compared to the previous year. Respective increases in market shares for the “Others” category and the San Miguel group were observed during the year, following their growth in the number of CCs. Meanwhile, the Ayala and the EDC group maintained their market shares at 7% and 9%, respectively.

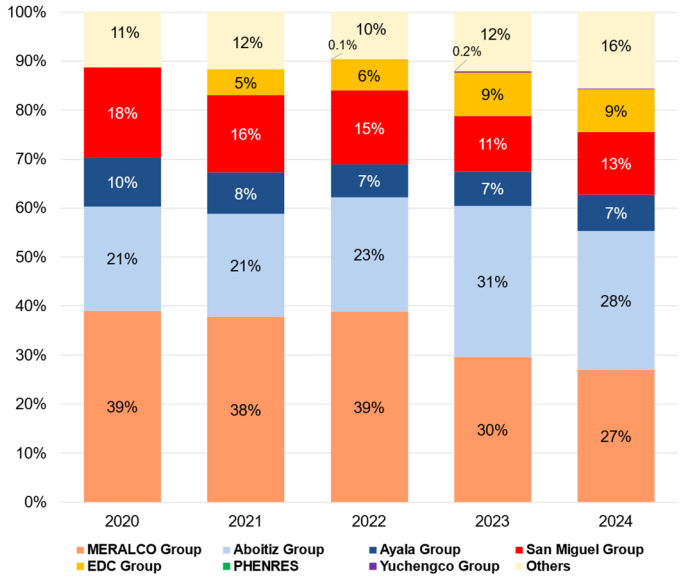

Figure 10. Share in CCs’ Energy Consumption Per Major Participant Grouping, 2020-2024

While the MERALCO group holds the largest number of CCs as shown in figure 9 the distribution of total energy consumption among MPGs presents a different dynamic. In terms of energy consumption, the Aboitiz group leads with a 28% share of total

energy consumption of CCs.

The same trend can also be observed for the San Miguel Group. Despite having fewer CCs than the Ayala Group, San Miguel surpasses Ayala in energy consumption share which suggests that CCs of San Miguel tend to be larger consumers with higher energy needs. In contrast, the customer base of Ayala likely consists of smaller consumers, resulting in a lower overall consumption share despite a higher number of CCs engaged.

These disparities indicate that the market share based on CC count does not always align with the energy consumption share, emphasizing the importance of customer segmentation in analyzing market dynamics. It also highlights the competitive positioning of participant groups, where some prioritize customer acquisition by the number, while others focus on securing high-energy-consuming clients.

1.2.1.2. Consumption Per Franchise Area

Geographically, registered CCs were dispersed throughout the various economic zones and DU franchise areas indicated in *Appendix B: List of Distribution Utility Franchise Areas and Economic Zones*.

As shown in figure 11, about 69.4% of the recorded consumption were from CCs located in the franchise area of MERALCO, 8.1% were directly connected to the transmission grid, 5.7% were within the VECO franchise, while the remaining 16.8% were scattered throughout the other franchise areas and economic zones.

The 1% increase in other DUs/ECs in 2024 was primarily driven by the commercial operation of RCOA in Mindanao, which led to the inclusion of more DUs from the region.

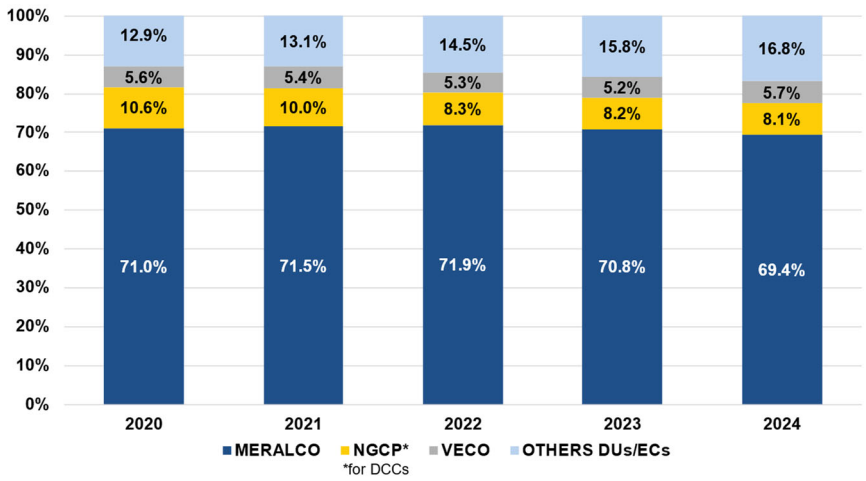

Figure 11. Share in CCs' Energy Consumption by Franchise Area, 2020-2024

Moreover, it is important to note that not all CCs within the MERALCO franchise area are served by MERALCO Group. As illustrated in figure 12, a significant portion of CCs have opted for other suppliers to meet their energy needs, with only 33% being supplied by the MERALCO Group. This share has been steadily declining, as more

CCs within the MERALCO franchise area choose alternative suppliers. The Aboitiz Group has been capturing a growing share of this market, as observed in figure 12.

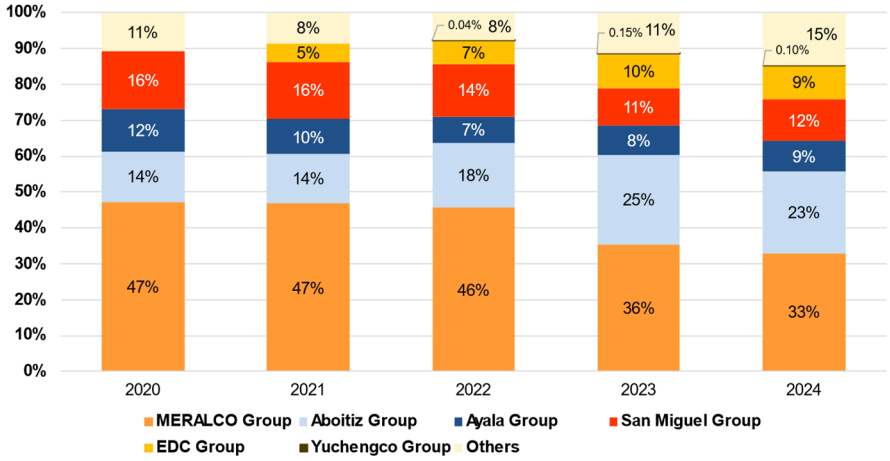

Figure 12. Share in CCs' Energy Consumption within MERALCO Franchise Area by Supplier, 2020-2024

1.2.2. Market Concentration

1.2.2.1. Herfindahl–Hirschman Index (HHI)[5]

This section discusses the market concentration by Supplier and MPG based on the contracted number of CCs and energy consumption. Figure 13 shows the level of market concentration using the HHI.

The concentration levels for both the number of engaged CCs and energy consumption have declined in 2024 compared to the previous year, both at the MPG level and per supplier level. However, while market concentration per supplier has decreased, the market remains concentrated at the MPG level. This suggests that while there is increased supplier diversity, dominance among MPGs still persists.

[5] HHI measures the degree of market concentration. Defined as the sum of the square of the Suppliers' market shares, the HHI threshold are as follows:
HHI < 1500 - not concentrated
1500 up to 2500 - concentrated
Greater than 2500 - highly concentrated

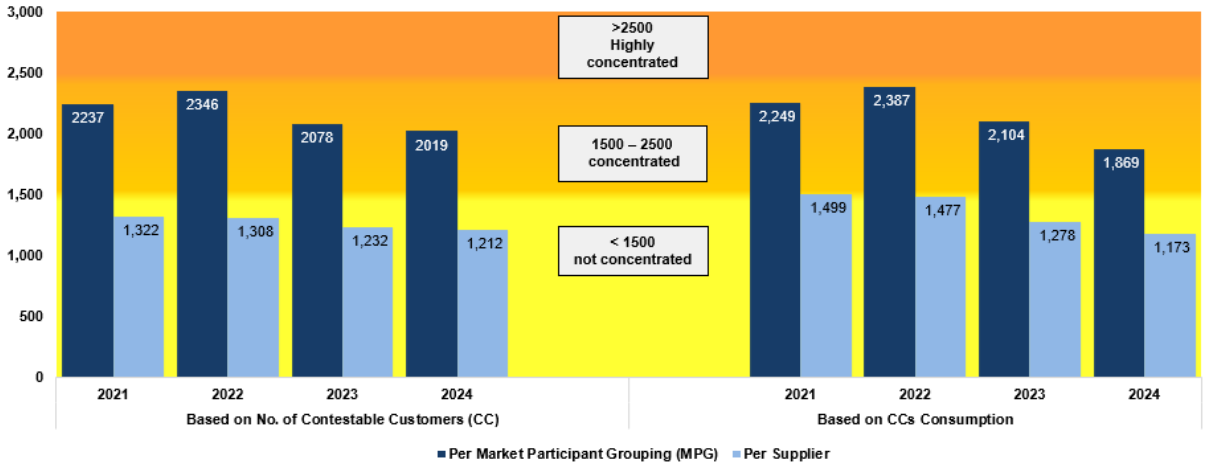

Figure 13. HHI Based on No. of CCs and Consumption, 2020-2024

1.2.2.2. Four-Firm Concentration Index (C4)[6]

The Four-Firm Index (C4) measures market concentration by Supplier and MPG based on the number of CCs and their consumption. Figure 14 shows that C4 values have declined to 77% in 2024, indicating that at the MPG level, market concentration has dipped to a medium level.

Despite the HHI suggesting that market concentration per supplier is low, the C4 index remains high, with the top four suppliers collectively holding more than 50% market share. This indicates that while there is some diversification among suppliers, the market is still classified as an oligopoly, with a few dominant firms maintaining significant influence.

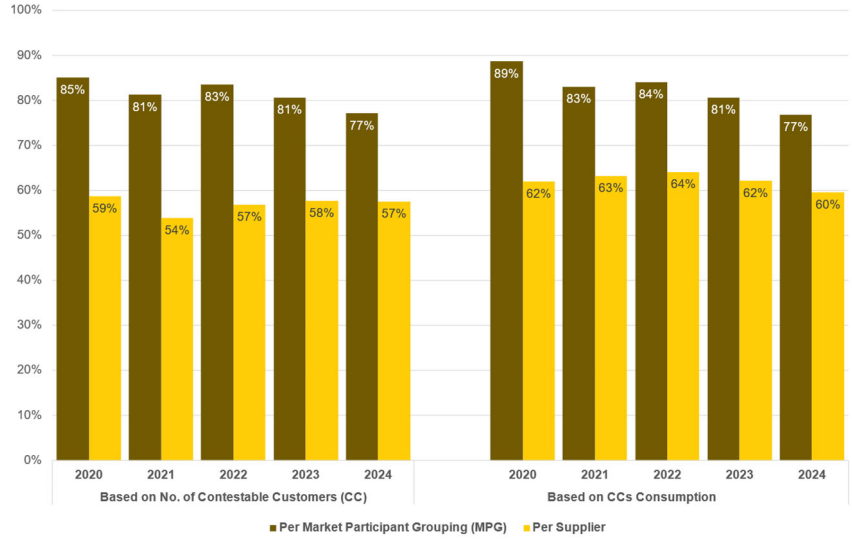

Figure 14. Four-Firm Index Based on Number of CCs and Consumption, 2020-2024

[6] C4 measures the cumulative market share of the four largest firms in the market. Concentration levels are as follows: High: 80% to 100%; Medium: 50% to 80%; and Low: 0% to 50%.

1.2.3. Supplier Structure

1.2.3.1. Supplier Affiliate

Figure 15 shows the degree of integration among the Suppliers, Generation Companies, and DUs as of 25 December 2024[7]. The Supplier structure shows that most of the RESs are affiliated with Generation Companies. Additionally, some Suppliers had affiliations with other Suppliers, DUs, or both, suggesting a vertically integrated structure that helps mitigate market volatility and supply chain disruptions.

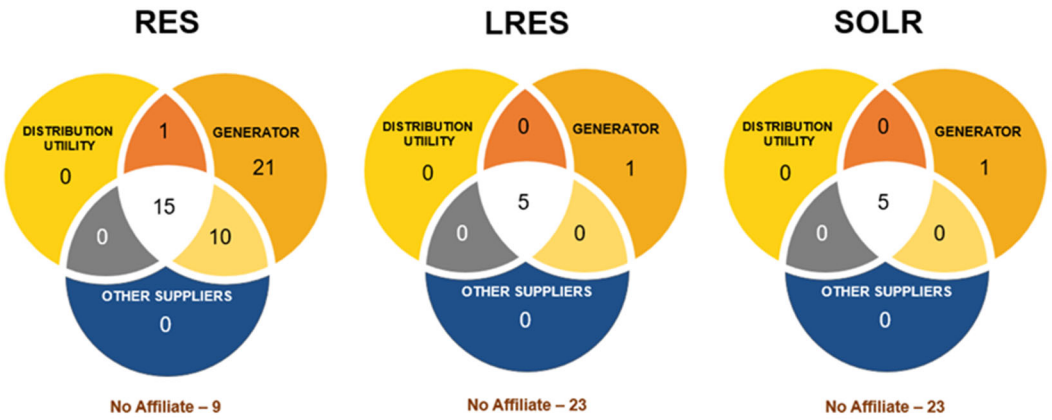

Figure 15. Summary of the number of Suppliers with Affiliate Generation Companies, Suppliers and Distribution Utilities [8]

Most RESs are affiliated with generators, DUs, and other suppliers. Specifically, 21 suppliers are affiliated with Generation Companies, while 10 have affiliations with other Suppliers or DUs. Only 9 suppliers have no affiliations. Such integration allows for better coordination between production and distribution, minimizing disruptions. Additionally, it can create operational efficiencies that lower costs for suppliers. However, these savings may not always translate to lower prices for CCs, as competitive dynamics and contractual terms influence pricing structures.

LRESs shows a more distributed structure, with fewer affiliations to generators or DUs, indicating a more independent supplier base.

1.3. MARKET PERFORMANCE

1.3.1. Energy Consumption

1.3.1.1. Total Energy Consumption

Figure 16 shows total energy consumption on a year-on-year basis for all End-users,

[7] Based on latest available ERC data.
[8] Note that one Supplier may have multiple affiliate Generation Companies, Suppliers, and/or Distribution Utilities.

including GEOP End-Users and registered CCs. The demand for electricity and the increase in the number of participants in RCOA are the two factors that affect these statistics for the retail market and GEOP.

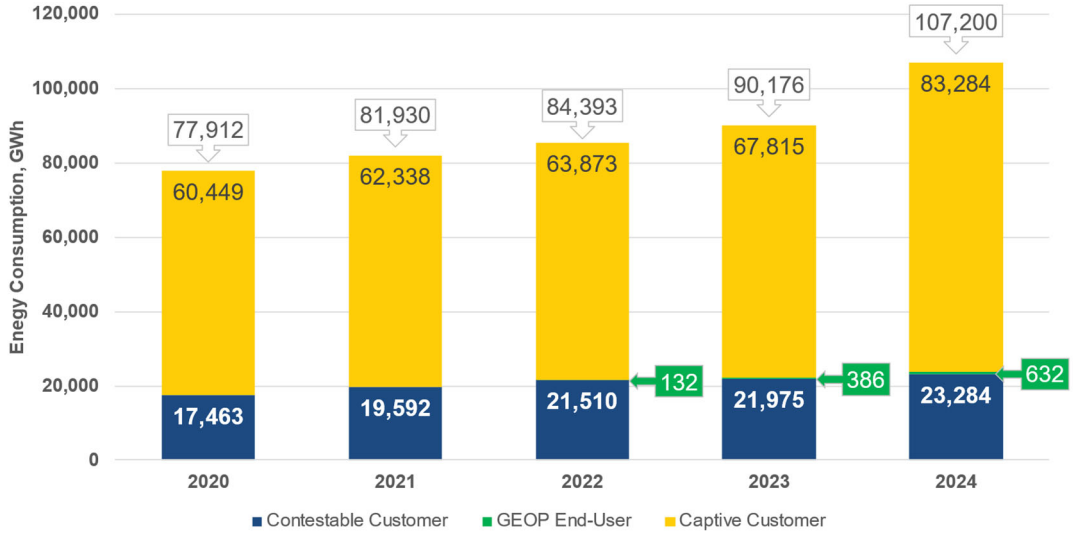

Figure 16. Total Energy Consumption (in GWh), 2020-2024

Further, there is a notable increase in total energy consumption across all customer groups, reflecting the natural demand growth. In 2024, total consumption rose by 18% compared to the previous year. This includes a 5% increase in energy consumption from CCs, an 18% rise in captive customer consumption, and a significant 64% increase in GEOP consumption, marking the third year since its implementation.

The sharp rise in GEOP consumption indicates a growing adoption of the program, while the steady increase in CC and captive customer consumption aligns with economic expansion and rising electricity demand.

1.3.2. Load Profile

1.3.2.1. Hourly Energy Consumption Profile

Figures 17 and 18 show the hourly average consumption of registered industrial and commercial CCs per month, respectively, for year 2024. The consumption profile demonstrates how electricity consumption of CCs varied over the course of a 24-hour period.

As depicted in figure 17, the electricity consumption patterns of industrial CCs show no significant fluctuations between peak and off-peak periods. However, it consistently exhibited troughs at specific intervals—0600h, 1300h, and 1900h — across each series. The data indicates a high likelihood of three-shift operations and/or break periods among these industrial customers.

In connection with the analysis presented in the earlier sections, it is evident that the load profiles of industrial consumers vary in average energy consumption. The October billing period exhibited the highest consumption, while the January billing

period had the lowest average consumption for 2024. October marks the peak production season for many industries, as manufacturers ramp up operations to meet increased demand ahead of the holiday season (November-December). Additionally, October signals the end of the rainy season, allowing to resume full-capacity operations without weather-related disruptions.

Conversely, January has the lowest electricity consumption of the year. The post-holiday slowdown affects many industries, particularly those in the manufacturing, retail, and consumer goods, as they scale back operations following peak production and sales periods of November and December.

Additionally, many businesses and manufacturing plants implement seasonal shutdowns or reduced work schedules during the first week of January for maintenance, inventory assessments, and workforce adjustments. This is also in line with compliance requirements set by the Department of Labor and Employment (DOLE), including inspections to ensure adherence to DOLE Department Order No. 238, Series of 2023[9]. These inspections are typically conducted in January, as compliance deadlines fall within this period, allowing businesses to meet regulatory requirements while minimizing operational disruptions.

Weather conditions also play a role, as January is one of the coolest months in the Philippines, leading to lower demand for cooling and air-conditioning demand in industrial facilities

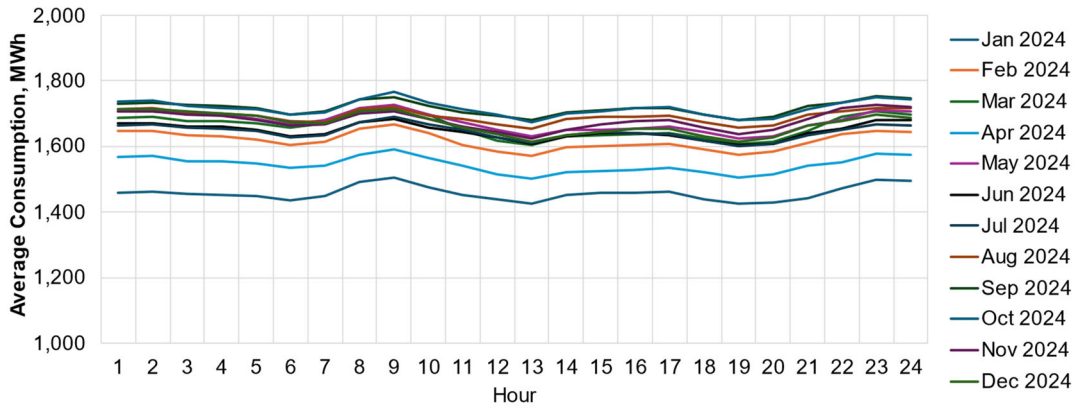

Figure 17. Hourly Average Energy Consumption (in MWh), Industrial, Jan to Dec 2024

Figure 18 shows notable differences in consumption patterns between peak and off-peak periods among registered commercial CCs. For these customers, the hours between 1000h to 2000h were when peak consumption was observed.

May 2024 recorded the highest consumption for the commercial sector. With the intense heat experienced in May, with heat index hitting between 48 and 50 degrees

[9] Rules on the Administration and Enforcement of Labor Standards Pursuant to Article 128 of the Labor Code of the Philippines, as renumbered, and Republic Act No. 11058

Celsius[10]. The billing period fuels a surge in air-conditioning demand, leading to a substantial increase in electricity consumption across shopping malls, office buildings, hotels, and restaurants. The retail and hospitality sectors also experienced peak activity, with tourism, hotels, resorts, and entertainment centers operating at full capacity, leading to sustained high energy consumption.

On the contrary, February 2024 recorded the lowest consumption during the period. As one of the coolest months in the Philippines, sees a lower need for cooling, which subsequently reduced the electricity demand. Additionally, the post-holiday economic slowdown led to decreased retail, hospitality, and entertainment activity, as businesses operated at reduced capacity following the peak shopping and travel season from November to December.

Unlike the summer months, January and February are the coolest months in 2024, the demand for air conditioning is lower. This contributed to these months recording the lowest commercial electricity consumption under RCOA, highlighting the seasonal influence on energy demand.

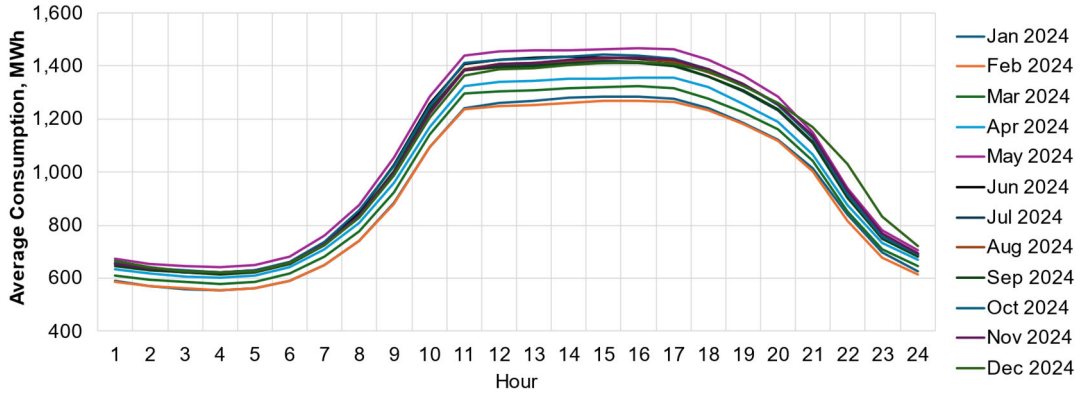

Figure 18. Hourly Average Energy Consumption (in MWh), Commercial, Jan to Dec 2024

1.3.2.2. Load Factor

Figure 19 shows the monthly load factor[11] of registered CCs for the year 2024. The load factors of registered CCs ranged from 75% to 82%. Significantly, the presence of holidays, and reduced working schedules during January, April, and December predominantly contributed to low load factors, falling below 80%, coinciding with the long holidays in observances of the Holy Week and Christmas Season.

A comparison with previous years (figure 20) reveals a consistent trend since 2020, where January, April, and December repeatedly exhibit the lowest load factors. This pattern highlights the seasonal impact of holidays and reduced business activity on electricity demand.

[10] Philippine Atmospheric, Geophysical and Astronomical Services Administration (PAGASA). (2024). *5-day Heat Index Forecast*. PAGASA. https://www.pagasa.dost.gov.ph/weather/heat-index

[11] Load factor is calculated as total consumption per industry type divided by the maximum hourly consumption multiplied by the total number of hours.

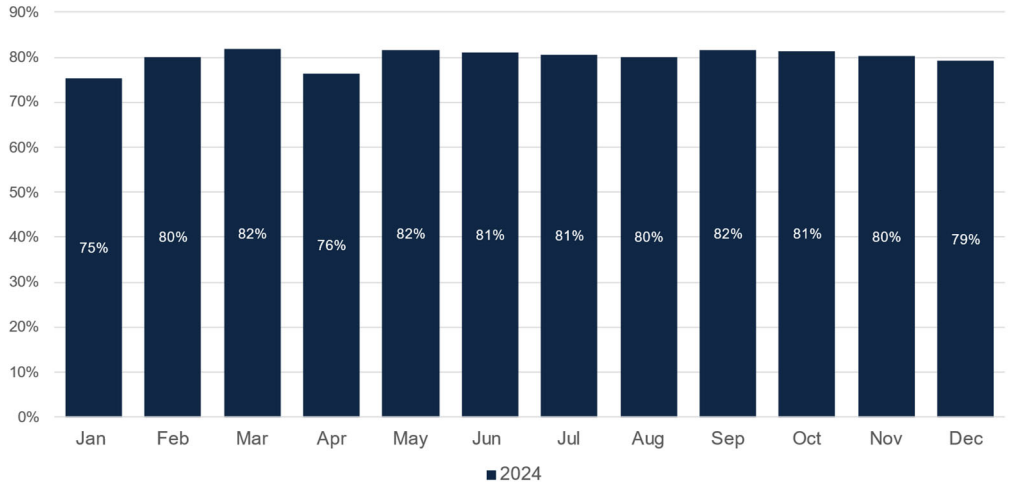

Figure 19. Load Factor, 2024

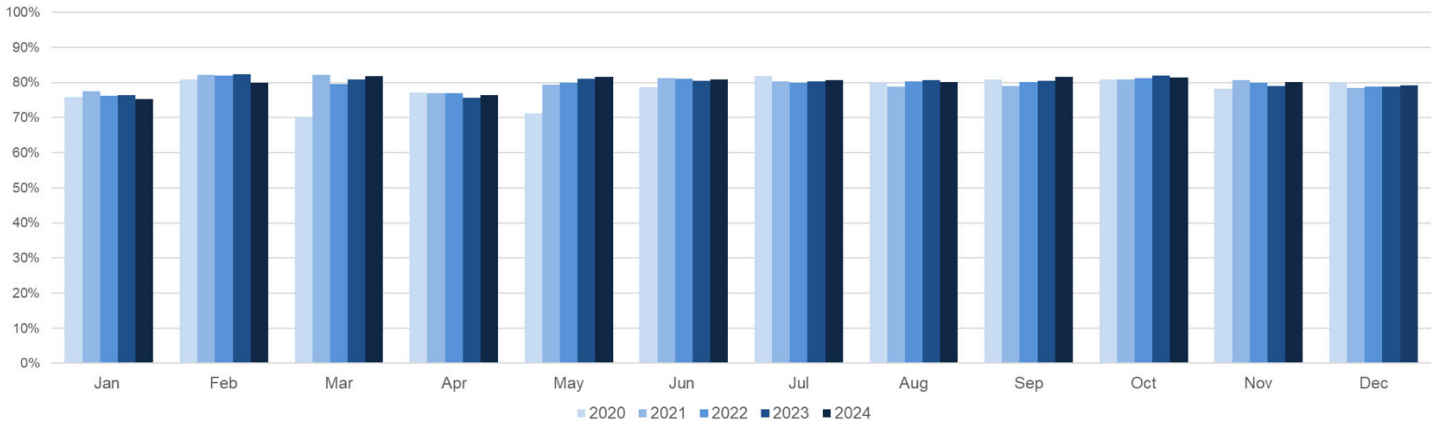

Figure 20. Load Factor, 2020-2024

1.4. RETAIL ACTIVITY

1.4.1. Customer Switching Rate

Figure 21 provides the 2024 monthly switching rate among registered CCs. Based on the data, there were two hundred forty-eight (248) instances of customer switching from one Supplier to another. Of those switches, approximately 37% occurred between Supplier affiliates. Additionally, two hundred nineteen (219) switches were due to expiration and non-renewal of contracts between parties. However, the remaining twenty-nine (29) observed switches stemmed from early termination of contracts, possibly influenced by factors like receiving a more competitive offer or the need for a more specific resource supply to meet the demand. Notably, the January billing period recorded the highest switching rate, which aligns with the historical trend of contract periods ending during that month.

In comparison, 2023 exhibited higher switching rates, with peaks exceeding 4% in certain months, whereas 2024 showed a more stable trend, with rates consistently below 2%. This decline suggests that CCs preferred longer contract terms. The minimal variations in switching rates throughout 2024 align with the relatively unchanged market share of RCOA and HHI, reinforcing the trend toward longer-term

agreements and reduced supplier movement.

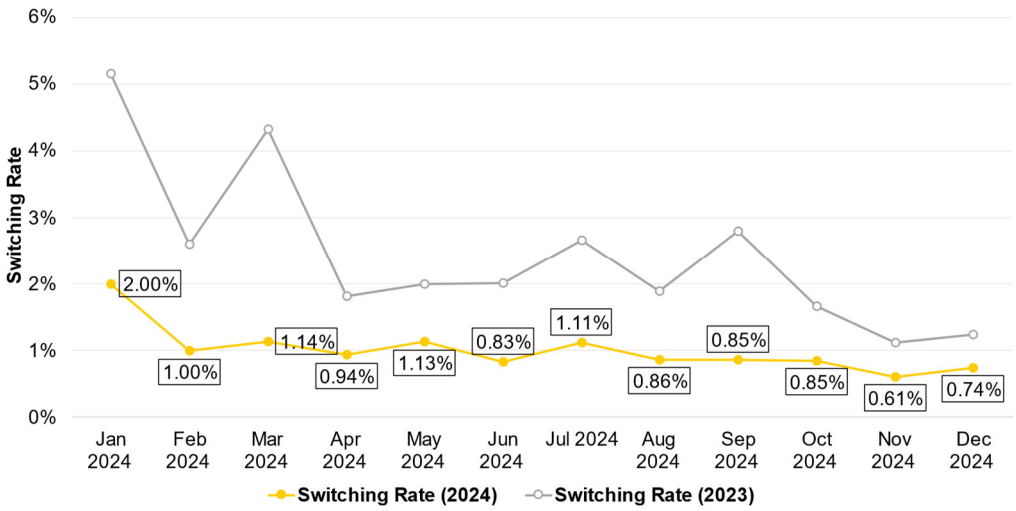

Figure 21. Switching Rate, Jan to Dec 2024

1.4.2. Retail Rate

Figure 22 highlights the volatility of DU generation rates throughout 2024, showing that DU rates were consistently higher than the Weighted-Average Retail Generation Rates[12] (retail rates), with an average of 14% more expensive than retail rates. DU rates exhibited significant fluctuations, peaking in July (PHP 7.26/kWh) and September (PHP 7.11/kWh), while the lowest rate was observed in June (PHP 5.17/kWh). In contrast, retail rates remained relatively stable, fluctuating within a narrow range, with the lowest rate at PHP 5.17/kWh in June and the highest at PHP 5.89/kWh in September.

The significant decrease in DU rates observed during June 2024 can be attributed to the order of the ERC to stagger the collection of Wholesale Electricity Spot Market (WESM) charges over four months (June to September 2024)[13]. However, the sharp increases in DU rates during July and September resulted from the staggered payment scheme implemented by DUs to recover generation charges due to high WESM prices during the Market Suspension in May 2024.

Meanwhile, retail rates under RCOA were less volatile due to long-term supply contracts, which shielded CCs from sudden price fluctuations. The retail market also benefited from supplier competition, driving lower and more predictable prices for CCs compared to the regulated DU market. Furthermore, those customized pricing structures provide further savings.

[12] Based on Competitive Retail Electricity Market (CREM) report of ERC
[13] Order ERC Case No. 2024-017 MC, *In the Matter of the Declaration of Market Suspension During Red Alerts During the Summer Months of 2024*.

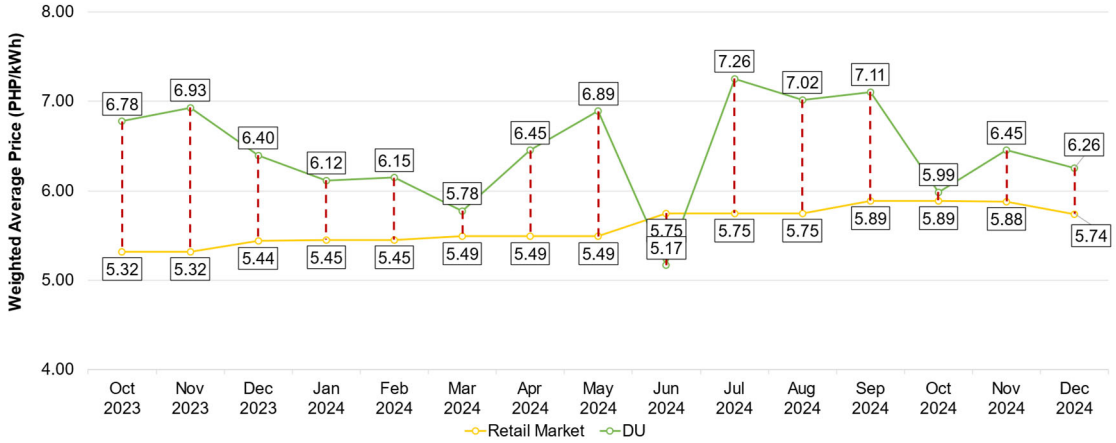

Figure 22. DU Average Generation Rate vs Retail Weighted Average Rate, Jan to Dec 2024

1.4.3. Estimated Savings

For the purpose of this report, monthly savings were calculated by determining the difference between the weighted-average retail rate and the DU average generation rates multiplied by the monthly consumption of CCs. It is important to note that these calculations were based on the available data and are considered as estimates.

Figure 23 highlights the cumulative estimated savings of PHP 16.76 billion incurred by CCs in the RCOA market throughout 2024, reinforcing the financial advantage of retail electricity market participation over traditional DU service. The highest recorded savings occurred in May, and July to September are due to high DU rates recorded in this period as observed in the previous section. In contrast, savings dipped in June and October, with June even recording negative savings, suggesting that retail market rates may have briefly exceeded DU rates. This further shows the extremity of DU rates fluctuations compared to retail rates.

The overall savings trend was driven by lower and more stable retail rates compared to volatile DU rates, allowing CCs to benefit from predictable and often lower costs. The significant total savings of 16.76 billion PHP underscores the long-term cost advantage of RCOA participation.

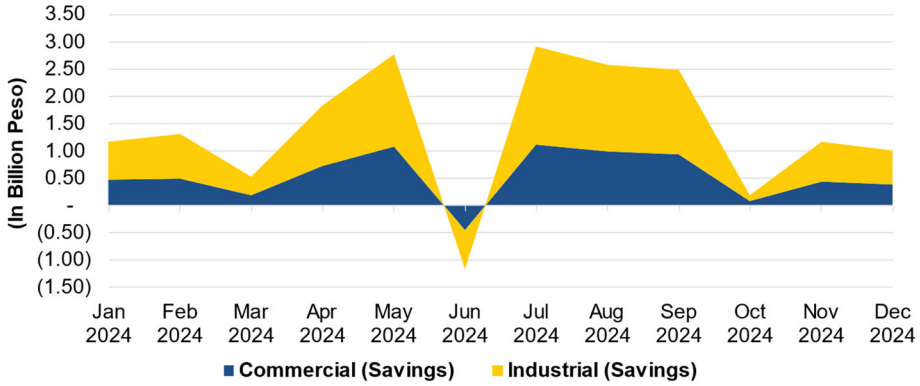

Figure 23. Cumulative Estimated Savings of CCs, Jan to Dec 2024

2. GREEN ENERGY OPTION PROGRAM

This section provides an assessment of the implementation of the Green Energy Option Program (GEOP) for the covered period, utilizing the RCOA indices as reference for the review of activities under this program.

2.1. MARKET STRUCTURE

2.1.1. Number of Participants

2.1.1.1. Per Threshold

For the year 2024, there were two hundred thirty-six (236) initial switches that were recorded, along with seven (7) end-users transferring from RCOA to GEOP. Meanwhile, thirteen (13) cessations were recorded during the year, and one (1) GEOP End-user transferred to RCOA. As a result, there was a net increase of two hundred twenty-nine (229) registered GEOP End-users joining the market, bringing the total number of registered GEOP End-users to 515. This marks an 80% increase from 2023.

Table 2. Cumulative Number of GEOP End-users per Threshold, 2022-2024

	100 to 499kW	500 to 749kW	750 to 999kW	1MW and above
2022	194	3	2	
2023	269	9	7	1
2024	497	10	7	1

Based on table 2, the majority of GEOP End-Users fall within the 100kW-499kW threshold, which is below the current threshold offered under the RCOA program.

Notably, eighteen (18) GEOP End-User opted to remain in the GEOP program despite being eligible for RCOA participation. This decision may have been driven by a preference for sourcing energy exclusively from renewable, potentially due to sustainability commitments or advocacy purposes.

2.1.1.2. Per Location

Figure 24 highlights the geographical distribution of GEOP End-Users, showing that the majority (82%) were located in Luzon, accounting for 424 out of 515 total GEOP End-Users. The remaining 18% (91 end-users) are in the Visayas, while no GEOP End-Users have been recorded yet in Mindanao as of 2024.

Luzon saw a significant increase in GEOP participation, growing from 147 end-users in 2022 to 208 in 2023, and further surging to 424 in 2024. Meanwhile, the Visayas exhibited a slower, linear increase, rising from 52 in 2022 to 78 in 2023, and reaching 91 in 2024.

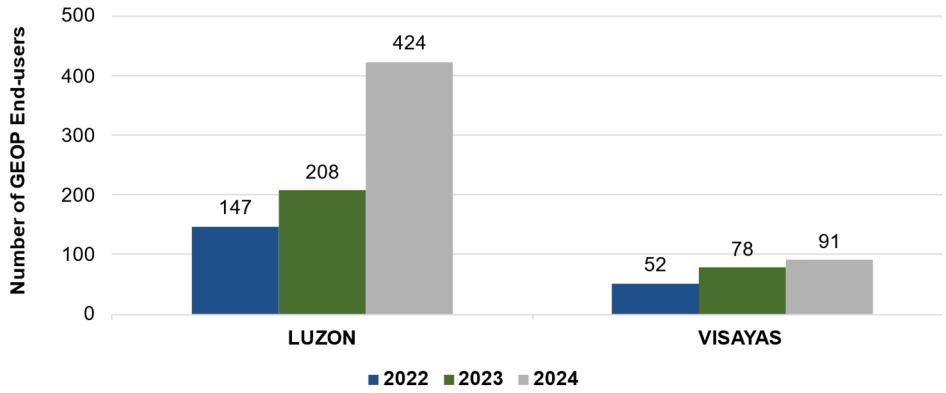

Figure 24. Cumulative Number of GEOP End-users Per Region, 2022-2024

2.1.1.3. Per Retail Activity

Looking at a per industry categorization within GEOP, there has been a notable increase in the share of GEOP End-Users from the commercial sector accounting to approximately 79% for the year 2024, with the remaining 21% coming from the industrial sector. Figure 25 illustrates the year-on-year comparison on the number of consumers since 2022.

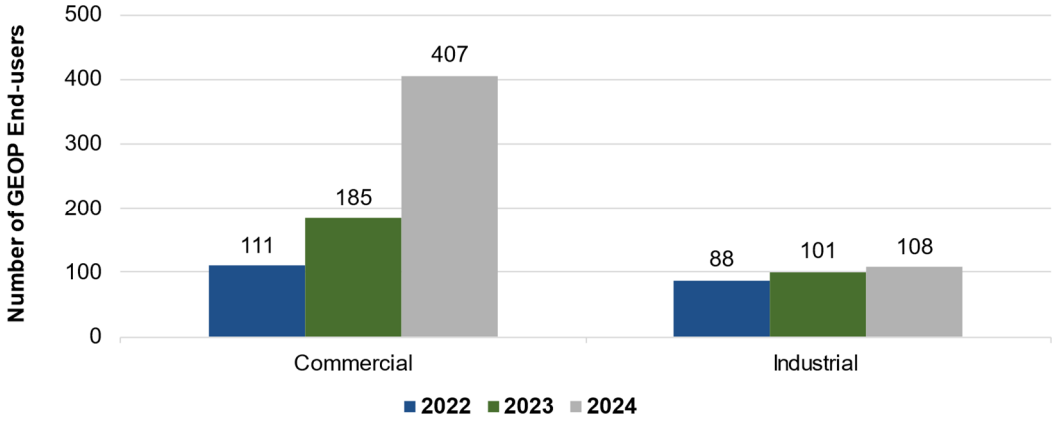

Figure 25. Cumulative Number GEOP End-users Per Industry, 2022-2024

2.1.1.4. Average Consumption

Figure 26 illustrates the distribution of average energy consumption among GEOP End-Users in 2024, revealing that 99.39% had average consumptions of 1 MWh or below, while only 0.61% recorded consumption between 1 MWh and 5 MWh.

These findings reinforce the segmentation between RCOA and GEOP, where GEOP is the only option for smaller consumers.

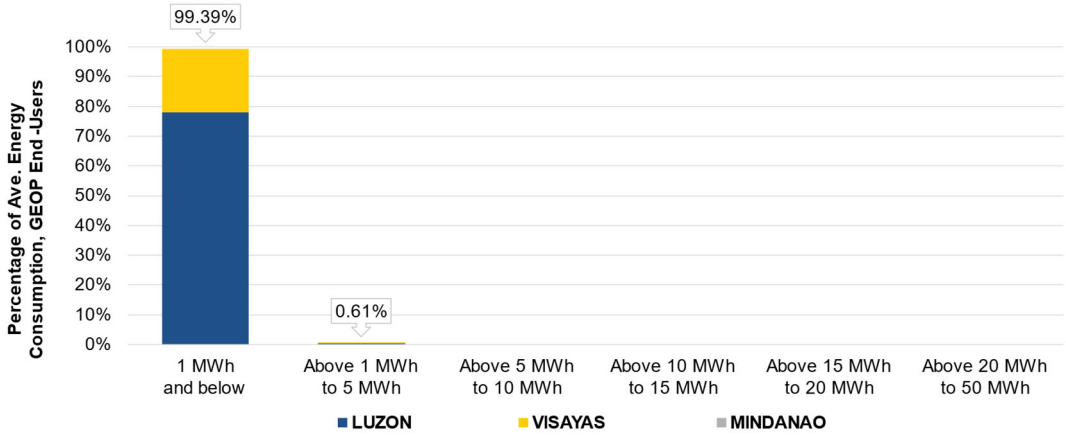

Figure 26. Distribution of CCs based on Average Energy Consumption, 2024

2.1.1.5. Suppliers

Within the GEOP framework, authorized RES are allowed to supply energy, contingent on possessing an operating permit from the Department of Energy (DOE) and proper authorization or a license from the ERC. These requirements enable them to operate as Renewable Energy (RE) Suppliers.

In 2024, a total of eighteen (18) registered RE Suppliers participated in the market, along with sixteen (16) designated SoLRs. Additionally, a Local RES (LRES) entered the market in May 2024.

As of 25 December 2024, nine (9) RE Suppliers and one (1) LRES had an active contract with GEOP End-users.

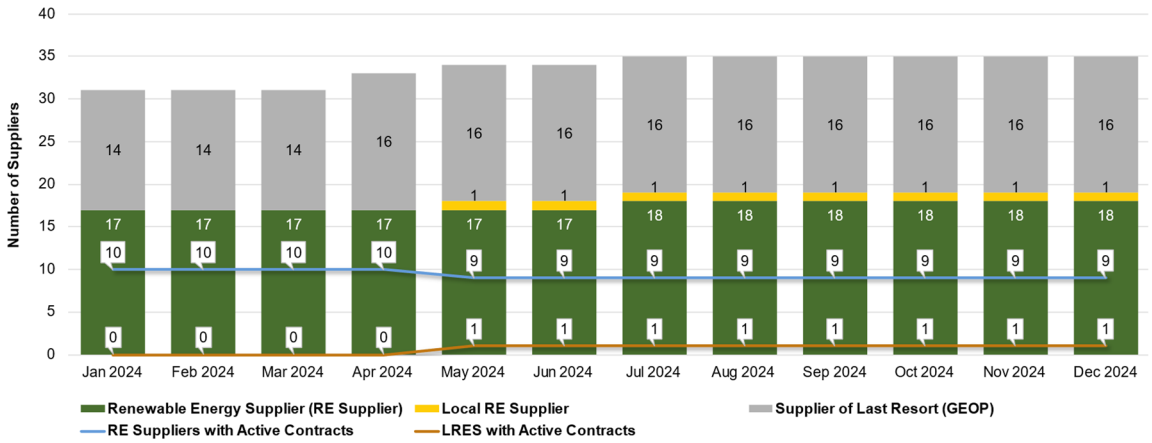

Figure 27. Number of Suppliers, 2024

Table 3. List of Newly Registered Renewable Energy Suppliers in 2024

Renewable Energy Supplier	
Supplier Name	**Date Registered**
FDC Retail Electricity Sales Corporation	15 Jul 2024
Local Renewable Energy Supplier	
Supplier Name	**Date Registered**
Manila Electric Company	08 May 2024

2.2. MARKET SHARE

2.2.1. Supplier Share

2.2.1.1. Share in terms of Number of GEOP End-users and Consumption

Figure 28 shows the annual share of RE Suppliers per MPG, based on the number of GEOP End-users registered in the market as of the December billing period for each year.

A year-on-year analysis reveals a significant increase in the market share of Ayala Group, rising from 38% in 2022 to 64% in 2024, making it the dominant player in the GEOP market. Meanwhile, the EDC Group holds the second largest share at 17%, followed by other suppliers at 14%. This growth highlights the expanding influence of Ayala in the program, while EDC and other suppliers continue to serve a smaller but notable portion of GEOP participants.

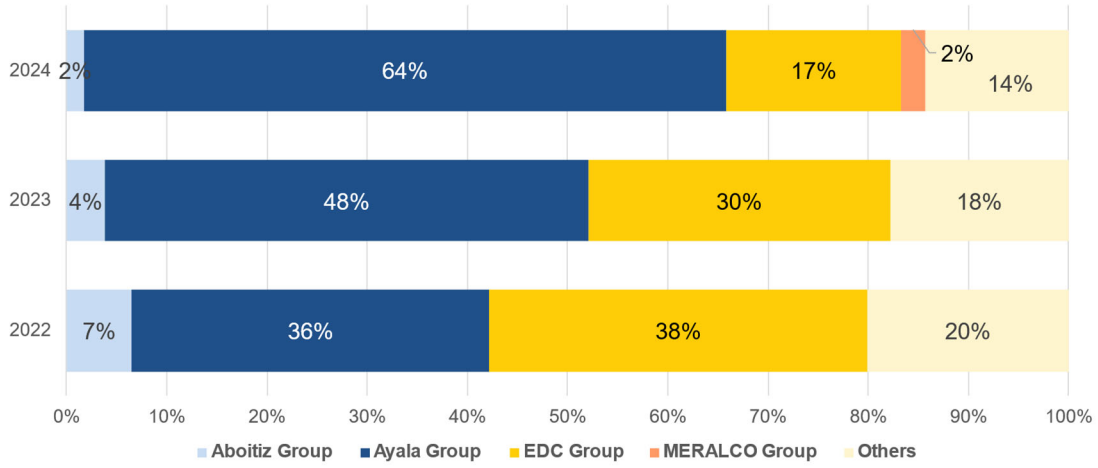

Figure 28. Share in Number of GEOP End-Users Per Major Participant Grouping, 2022-2024

A similar trend is reflected in total energy consumption, as shown in figure 29. With Ayala supplying more than half of GEOP End-Users, it also accounted for 54% of total energy consumption in 2024, up from 38% in 2023. The EDC Group provided 24% of total energy consumption, followed by other suppliers at 18%, and MERALCO LRES at 2%.

These figures indicate that the dominance of the Ayala group extends beyond customer count and up to the total energy served, reinforcing its strong market

presence within GEOP.

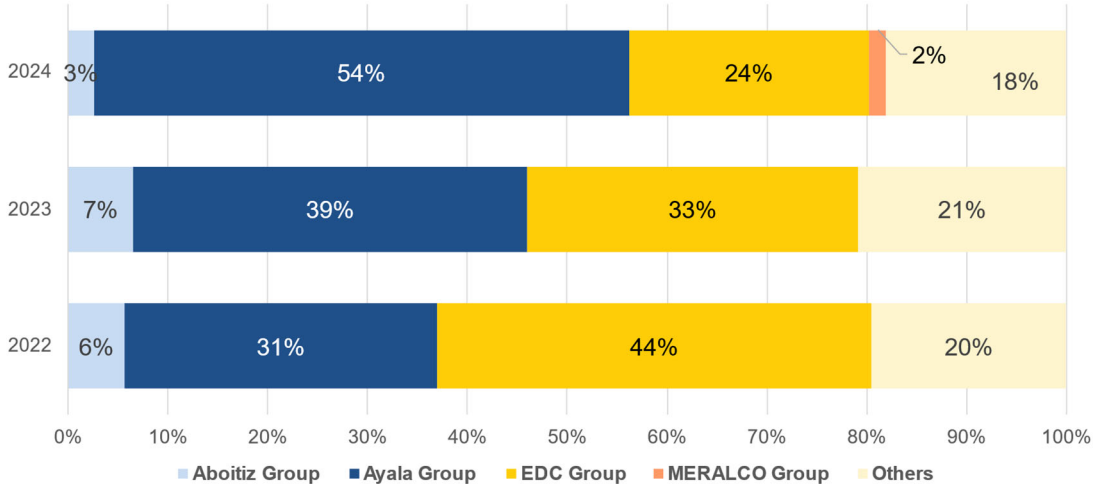

Figure 29. Share in Total Served Energy Consumption of GEOP End-users Per Major Participant Grouping, 2022-2024

2.2.1.2. Per Franchise Area Location

Geographically, registered GEOP End-users were spread throughout the various economic zones and DU franchise areas indicated in *Appendix B: List of Distribution Utility and Economic Zones*.

Nonetheless, the bulk of the consumption by registered GEOP End-users is situated within the franchise area of MERALCO, comprising approximately 68%. Another 15% falls within the VECO franchise area, while the remaining 17% are dispersed across other franchise areas and economic zones.

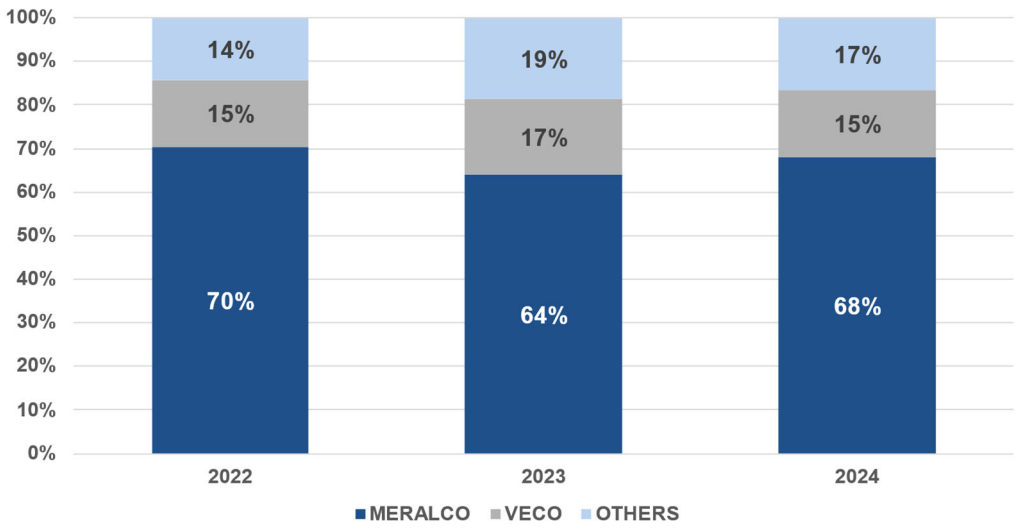

Figure 30. GEOP End-Users Energy Consumption by Franchise Area, 2022-2024

Figure 31 illustrates that inside the MERALCO franchise area, the majority of the

GEOP End-Users were being supplied by the Ayala group at around 62%, followed by the EDC group at 26% forming the top two MPG serving in GEOP.

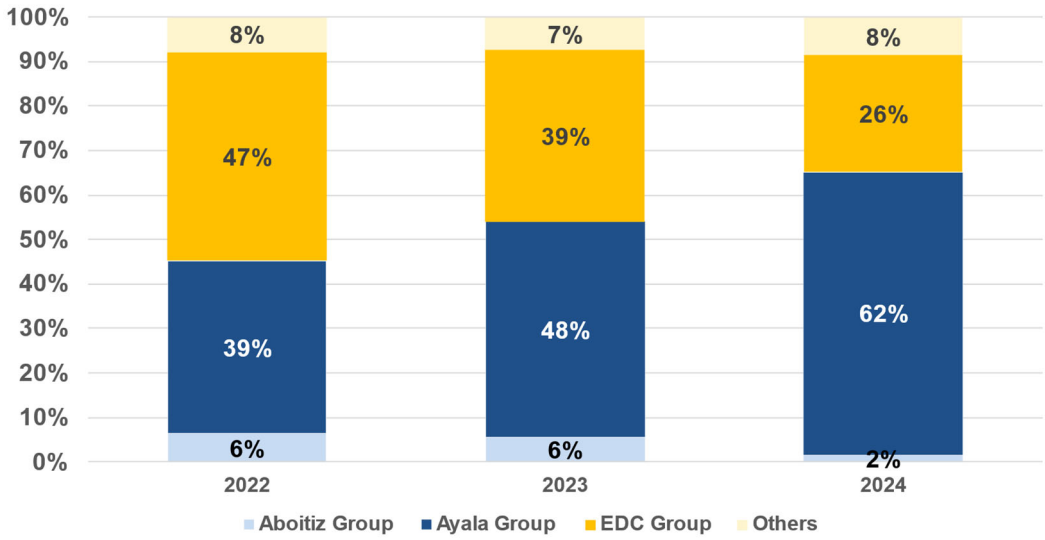

Figure 31. GEOP End-Users Served Energy Consumption by Supplier within MERALCO Franchise Area, 2022-2024

Moreover, with the growing share of the Ayala group within the franchise area of MERALCO, it has continued as the leading market participant across all indices.

2.2.2. Market Concentration

2.2.2.1. Herfindahl–Hirschman Index (HHI)

This section discusses the market concentration in GEOP by Supplier and MPG. This index was based on the number of contracted GEOP End-users and the corresponding energy consumption of these GEOP End-users.

Figure 32 highlights the HHI values, indicating a high level of market concentration for both GEOP End-Users and served energy consumption. The continued increase in both the number of GEOP End-Users and their energy consumption within the Ayala Group has further intensified the market concentration, leading to a decline in competition within the program.

When assessing market shares on a per RE Supplier basis, the market was also found to be concentrated. The data shows a notable rise in the share of a single RE supplier, bringing its market influence close to the threshold of being classified as highly concentrated. This increase in supplier dominance not only affects individual supplier shares but also extends to the overall MPG level, further reinforcing reduced competition.

The escalating concentration levels, particularly in 2024, suggest that the GEOP market is becoming increasingly dominated by a few key players, raising concerns about limited supplier diversity.

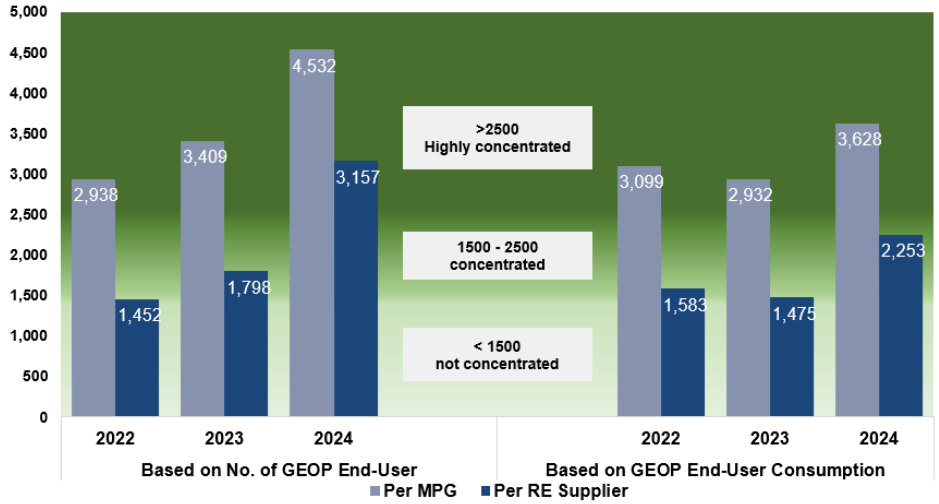

Figure 32. HHI Values, 2022-2024

2.2.2.2. Four-Firm Concentration Index (C4)

With regard to the four-firm index or C4 for the GEOP, the same observation with HHI may be observed. During the period in review, C4 values remained high for both measures at about 96% for both.

Furthermore, when considering the shares of each supplier, the market continues to exhibit characteristics of an oligopoly, with the top four (4) suppliers collectively controlling more than 50% of the total shares. Specifically, these four (4) suppliers control as much as 84% of the market when assessed in terms of the number of GEOP End-Users and 78% in terms of energy consumption. This resulting concentration may be attributed to the early stages of GEOP implementation, and the unique characteristics of energy sources involved in the program.

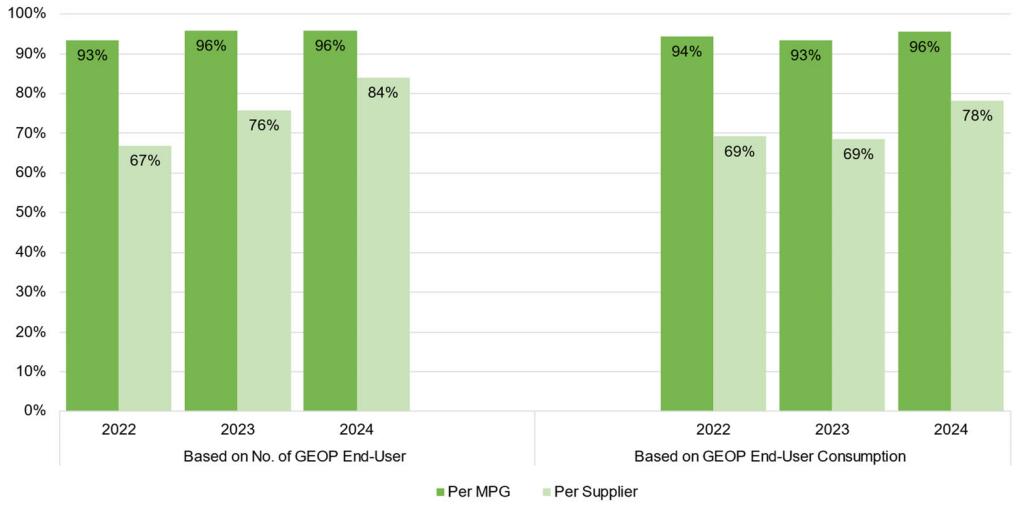

Figure 33. Four-Firm Index, 2022-2024

2.3. MARKET PERFORMANCE

2.3.1. Energy Consumption

2.3.1.1. Monthly Energy Consumption

Figure 34 illustrates the monthly energy consumption trend of GEOP End-Users in 2024, showing steady growth in the first half of the year, followed by a sharp increase from August to November. From January to June, consumption grew incrementally, rising from 40GWh to 49GWh, reflecting the gradual onboarding of new GEOP participants and stable commercial sector demand. However, from August to November, a significant jump occurred, reaching 68GWh in November and peaking at 69GWh in December, suggesting higher enrollment of new end-users, increased commercial activity, and seasonal demand fluctuations.

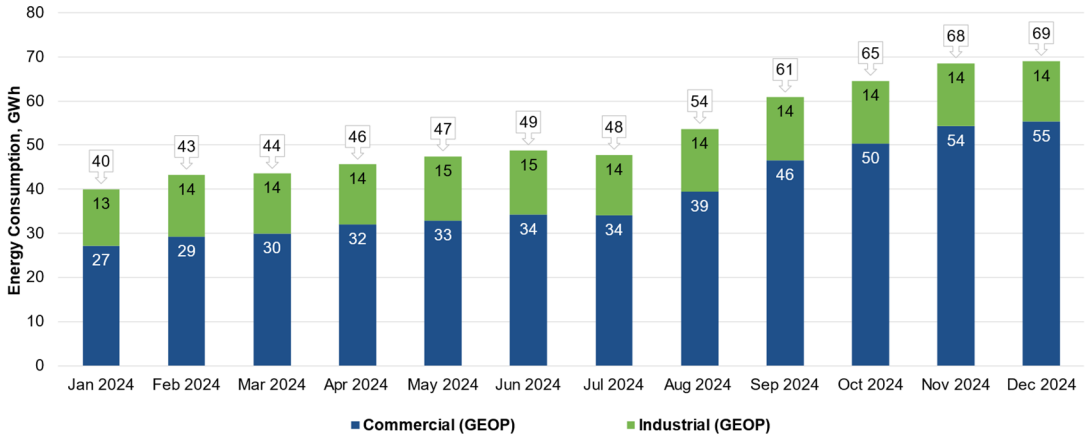

Figure 34. Total Energy Consumption Industry Type (in GWh), Jan to Dec 2024

2.3.2. Load Profile

2.3.2.1. Hourly Energy Consumption Profile

Figures 35 and 36 show the hourly average consumption of registered industrial and commercial GEOP End-users, respectively, for the year 2024. The consumption profile demonstrated how their electricity consumption varied over the course of a 24-hour period.

Industrial facilities in the GEOP program exhibited relatively stable electricity consumption throughout the day, with minimal variations between peak and off-peak hours and limited seasonal fluctuations.

Similar to RCOA, the regular dips observed at specific times suggest that these facilities are likely to operate in shifts or have scheduled breaks. A similar trend is observed in RCOA, where January 2024 recorded the lowest load profile due to post-holiday slowdowns. After this slowdown in January, a ramp-up in operations may have contributed to a steady increase, peaking in May 2024, which recorded the highest industrial load profile of the year, likely influenced by peak summer demand

and higher production activity.

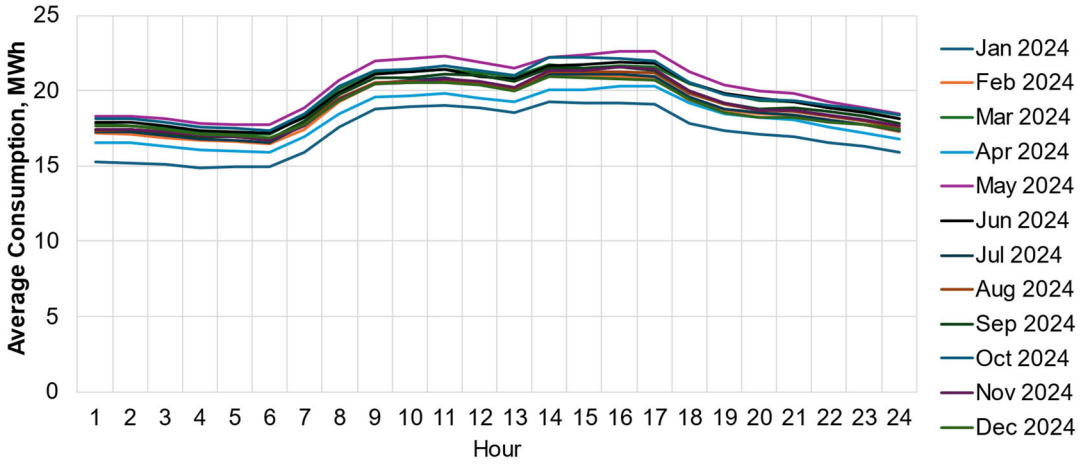

Figure 35. Hourly Average Energy Consumption (in MWh), Industrial, Jan to Dec 2024

Meanwhile, figure 35 highlights the hourly energy consumption trends for GEOP End-Users in the commercial sector, showing that their peak consumption occurs between 1000h and 2000h, reflecting the typical operating hours of shops, offices, and restaurants. The graph also reveals a steady month-to-month increase in energy consumption, suggesting higher overall electricity usage as more participants join the program. This trend reinforces the growing adoption of GEOP among commercial customers, driven by renewable energy incentives and sustainability initiatives.

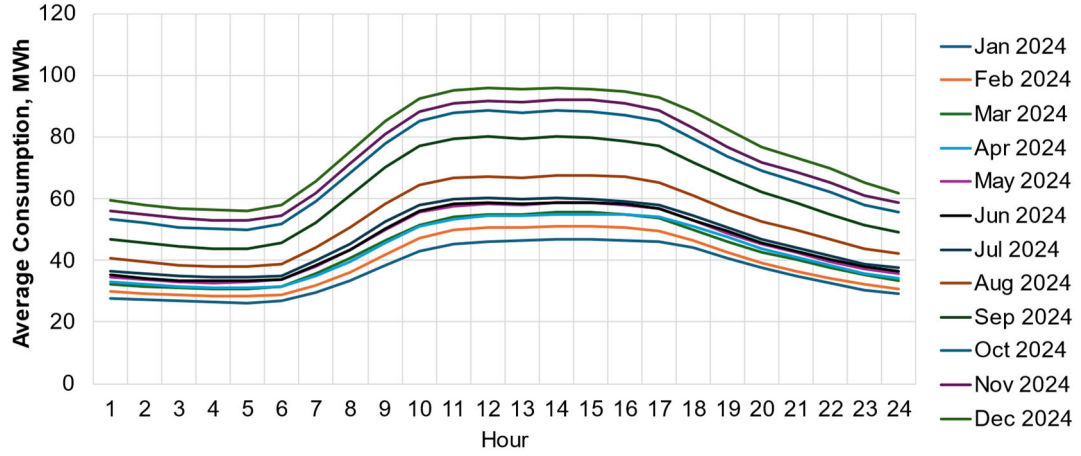

Figure 36. Hourly Average Energy Consumption (in MWh), Commercial, Jan to Dec 2024

2.3.2.2. Load Factor

Figure 37 illustrates the monthly load factor of registered GEOP End-Users, showing that load factors consistently remained above 70% throughout 2024, except for December, which recorded a load factor of 69%. This decline may be attributed to a slowdown in operations across both industrial and commercial sectors during the holiday season, leading to sudden lower electricity consumption than usual thereby affecting the computation.

The high and stable load factors throughout the year suggest that GEOP participants maintain steady energy usage patterns, indicating efficient utilization of contracted energy capacity. However, the drop in December reflects the seasonal impact on electricity demand, particularly in industries and businesses that reduce operations or implement holiday breaks.

A comparison with previous years (2022-2024) in figure 38 further confirms this seasonal trend, with December consistently recording the lowest load factors. This pattern reinforces the impact of annual holiday-related slowdowns on electricity consumption.

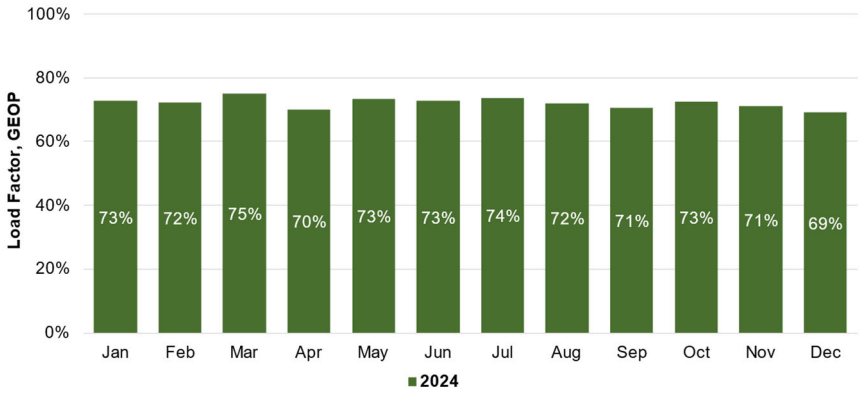

Figure 37. Load Factor, 2024

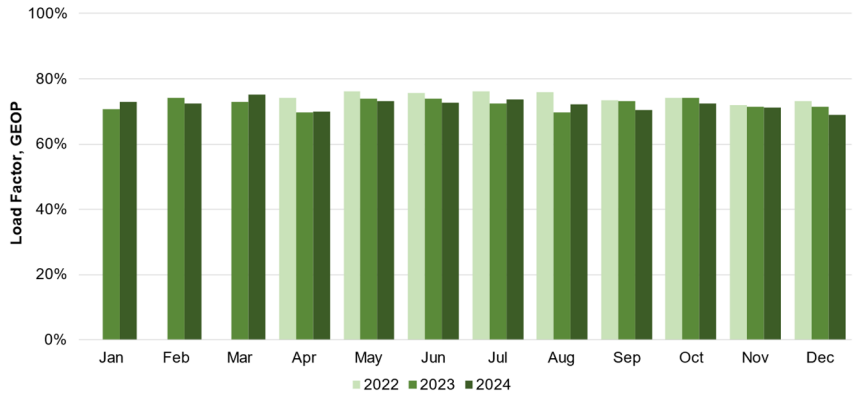

Figure 38. Load Factor, 2022-2024

2.4. RETAIL ACTIVITY

2.4.1. Customer Switching Rate

Figure 39 provides the historical switching rate among registered GEOP End-users for the year 2024. Based on the data, only seven (7) out of the 12 billing periods recorded customers switching from one Supplier to another. Furthermore, seventeen (17) out of the nineteen (19) switches were due to the expiration of contract and its subsequent non-renewal, while the remaining two (2) switches stemmed from the termination of contracts, possibly influenced by factors like receiving a more competitive offer or the need for a more specific resource supply to meet the

demand.

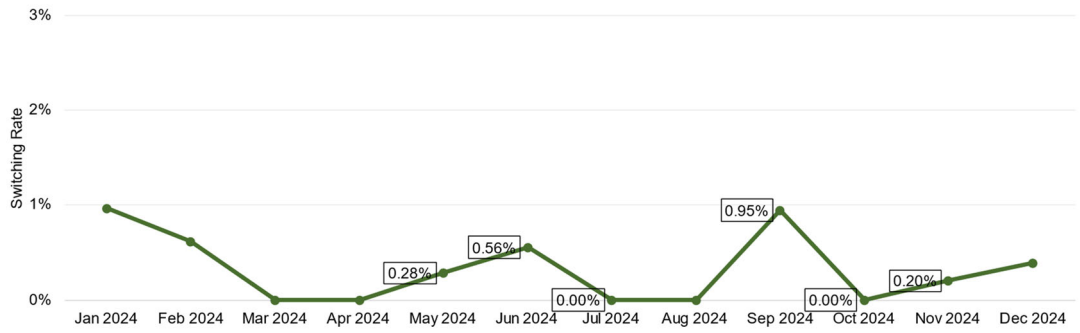

Figure 39. Switching Rate, Jan to Dec 2024

APPENDIX A - LIST OF REGISTERED SUPPLIERS

Category	No.	Market Participant Name	RCOA	GEOP
Retail Electricity Supplier (RES) and Renewable Electricity Supplier (RE Supplier)	1	Aboitiz Energy Solutions, Inc.	✓	✓
	2	AC Energy and Infrastructure Corporation	✓	
	3	ACEN Corporation (Formerly known as AC Energy Corporation)	✓	✓
	4	ACX3 Capital Holdings Inc.	✓	
	5	Advent Energy, Inc.	✓	✓
	6	Alsons Power Supply Corporation	✓	
	7	Alluma Energy Management Solutions, Inc	✓	
	8	Anda Power Corporation RES	✓	
	9	AP Renewables Inc.	✓	✓
	10	Asiapac Green Renewable Energy Corp.	✓	
	11	Bac-Man Geothermal, Inc.	✓	✓
	12	Citicore Energy Solutions, Inc.	✓	✓
	13	Corenergy, Inc.	✓	
	14	DirectPower Services, Inc.	✓	✓
	15	Ecozone Power Management, Inc.	✓	
	16	EEI Energy Solutions Corporation	✓	✓
	17	Enerxia Corporation		
	18	EvoEnergi Inc.		
	19	FDC Retail Electricity Sales Corporation	✓	✓
	20	First Gen Energy Solutions, Inc.	✓	✓
	21	Global Energy Supply Corporation	✓	
	22	GNPower Ltd. Co.	✓	
	23	Green Energy Supply Solutions, Inc.		
	24	Green Core Geothermal, Inc.	✓	✓
	25	Jin Navitas Electric Corporation	✓	
	26	Hypergreen RES Energy Corporation		
	27	KEPCO SPC Power Corporation	✓	
	28	Kratos RES, Inc.	✓	✓
	29	Mabuhay Energy Corporation	✓	
	30	Masinloc Power Partners Company Limited	✓	
	31	Mazzaraty Energy Corporation	✓	
	32	MegawattSolutions Inc.	✓	
	33	MeridianX Inc.	✓	
	34	MINERGY Retail Energy Solutions, Inc.		
	35	PetroGreen Energy Corporation	✓	
	36	Premier Energy Resources Corporation	✓	
	37	PrimeRES Energy Corporation		
	38	Prism Energy, Inc.	✓	✓
	39	Real Energy Corporation		
	40	Rockport Power Inc.	✓	

	41	SEM-Calaca RES Corporation	✓	
	42	Shell Energy Philippines, Inc. - RES	✓	✓
	43	Limay Power Inc. (formerly SMC Consolidated Power Corporation)	✓	
	44	SN Aboitiz Power- Magat, Inc.	✓	✓
	45	SN Aboitiz Power-RES, Inc.	✓	✓
	46	Solar Philippines Retail Electricity, Inc.	✓	✓
	47	Sunny Side Up Power Corporation		
	48	TeaM (Philippines) Energy Corporation	✓	
	49	Therma Luzon, Inc.	✓	✓
	50	Vantage Energy Solutions and Management, Inc.	✓	

Category	No.	Market Participant Name	RCOA	GEOP
Local Retail Electricity Supplier	1	Batangas II Electric Cooperative, Inc.	✓	
	2	Camarines Sur II Electric Cooperative, Inc.	✓	
	3	Cebu I Electric Cooperative, Inc.	✓	
	4	Cebu II Electric Cooperative, Inc.	✓	
	5	Central Negros Electric Cooperative, Inc.	✓	
	6	Clark Electric Distribution Corporation LRES	✓	
	7	Dagupan Electric Corporation	✓	
	8	Ilocos Norte Electric Cooperative, Inc.	✓	
	9	Mactan Enerzone Corporation LRES	✓	
	10	Manila Electric Company	✓	✓
	11	Nueva Ecija I Electric Cooperative, Inc.	✓	
	12	San Fernando Electric Light & Power Co., Inc.	✓	
	13	Subic Enerzone Corporation	✓	
	14	Tarlac Electric, Inc.	✓	
	15	Visayan Electric Company, Inc.	✓	

Category	No.	Market Participant Name	RCOA	GEOP
Supplier of Last Resort	1	Angeles Electric Corporation	✓	✓
	2	Balamban Enerzone Corporation	✓	
	3	Batangas II Electric Cooperative, Inc.	✓	✓
	4	Benguet Electric Cooperative, Inc.	✓	
	5	Bohol I Electric Cooperative, Inc.	✓	
	6	Bohol Light Company, Inc.	✓	
	7	Cabanatuan Electric Corporation	✓	
	8	Camarines Sur II Electric Cooperative, Inc.	✓	
	9	Cebu I Electric Cooperative, Inc.	✓	✓
	10	Cebu II Electric Cooperative, Inc.	✓	
	11	Central Negros Electric Cooperative, Inc.	✓	
	12	Clark Electric Distribution Corporation	✓	

Category	No.	Market Participant Name	RCOA	GEOP
	13	Dagupan Electric Corporation	✓	✓
	14	Ilocos Norte Electric Cooperative, Inc.	✓	
	15	Ilocos Sur Electric Cooperative, Inc.	✓	
	16	Iloilo I Electric Cooperative, Inc.		✓
	17	Isabela I Electric Cooperative, Inc.	✓	
	18	La Union Electric Cooperative, Inc.	✓	✓
	19	Mactan Electric Company, Inc.	✓	✓
	20	Mactan Enerzone Corporation	✓	✓
	21	Manila Electric Company	✓	✓
	22	Negros Oriental II Electric Cooperative, Inc.	✓	
	23	Peninsula Electric Cooperative, Inc.	✓	
	24	Subic Enerzone Corporation	✓	
	25	Tarlac Electric, Inc.	✓	✓
	26	Tarlac I Electric Cooperative, Inc	✓	✓
	27	Tarlac II Electric Cooperative, Inc	✓	✓
	28	Visayan Electric Company, Inc.	✓	✓

APPENDIX B - LIST OF DISTRIBUTION UTILITIES / ECONOMIC ZONES WITH CONTESTABLE CUSTOMERS AND GEOP END-USERS

No.	Distribution Utility/ Economic Zone	RCOA	GEOP	No.	Distribution Utility/ Economic Zone	RCOA	GEOP
1	Agusan del Norte Electric Cooperative, Inc.	✓	✓	49	Leyte IV Electric Cooperative, Inc.	✓	
2	Agusan del Sur Electric Cooperative, Inc.	✓	✓	50	Leyte V Electric Cooperative, Inc.	✓	
3	Aklan Electric Cooperative	✓		51	LIMA Enerzone Corporation	✓	
4	Albay Electric Cooperative, Inc.	✓		52	Mactan Ecozone II	✓	
5	Angeles Electric Corporation	✓	✓	53	Mactan Electric Company	✓	
6	Authority Freeport Area of Bataan	✓	✓	54	Mactan Enerzone Corporation	✓	✓
7	Baguio City Economic Zone	✓	✓	55	Malvar EnerZone Corporation	✓	
8	Batangas I Electric Cooperative, Inc.	✓	✓	56	Manila Electric Company	✓	✓
9	Batangas II Electric Cooperative, Inc.	✓		57	Misamis Occidental II Electric Cooperative, Inc.	✓	
10	Benguet Electric Cooperative, Inc.	✓		58	Misamis Oriental I Electric Cooperative, Inc.	✓	
11	Bohol I Electric Cooperative, Inc.	✓		59	Misamis Oriental II Electric Cooperative, Inc.	✓	
12	Bohol Light Company, Inc.	✓		60	MORE Electric and Power Corporation	✓	✓
13	Bukidnon II Electric Cooperative, Inc.	✓		61	Negros Occidental Electric Cooperative	✓	
14	Cabanatuan Electric Corporation	✓		62	Negros Occidental Electric Cooperative, Inc.	✓	✓
15	Cagayan Electric Power & Light Company, Inc.	✓		63	Negros Oriental I Electric Cooperative	✓	
16	Cagayan I Electric Cooperative, Inc.	✓		64	Negros Oriental II Electric Cooperative	✓	
17	Cagayan II Electric Cooperative, Inc.	✓	✓	65	Negros Oriental II Electric Cooperative, Inc.	✓	✓
18	Camarines Norte Electric Cooperative	✓		66	Northern Davao Electric Cooperative, Inc.	✓	
19	Camarines Sur II Electric Cooperative, Inc.	✓	✓	67	Northern Negros Electric Cooperative, Inc.	✓	
20	Capiz Electric Cooperative, Inc.	✓	✓	68	Northern Samar Electric Cooperative	✓	
21	Cavite Economic Zone	✓	✓	69	Nueva Ecija I Electric Cooperative, Inc.	✓	
22	Cebu I Electric Cooperative, Inc.	✓	✓	70	Nueva Ecija II Electric Cooperative, Inc. Area 1	✓	
23	Cebu II Electric Cooperative, Inc.	✓		71	Nueva Ecija II Electric Cooperative, Inc. Area 2	✓	
24	Cebu III Electric Cooperative, Inc.	✓		72	Nueva Vizcaya Electric Cooperative	✓	
25	Central Negros Electric Cooperative, Inc.	✓		73	Occidental Mindoro Electric Cooperative, Inc.	✓	
26	Central Pangasinan Electric Cooperative	✓		74	Pampanga I Electric Cooperative, Inc.	✓	
27	Clark Electric and Distribution Corp.	✓		75	Pampanga II Electric Cooperative, Inc.	✓	✓
28	Cocochem Agri-Industrial Park	✓		76	Pampanga III Electric Cooperative, Inc.	✓	
29	Consort Land Inc.	✓	✓	77	Pangasinan I Electric Cooperative, Inc.	✓	
30	Cotabato Electric Cooperative, Inc.	✓		78	Pangasinan III Electric Cooperative, Inc.	✓	✓
31	Cotabato Light and Power Company	✓		79	Peninsula Electric Cooperative, Inc.	✓	
32	Dagupan Electric Corporation	✓		80	Samar I Electric Cooperative, Inc.	✓	✓
33	Davao del Sur Electric Cooperative, Inc.	✓		81	San Fernando Electric Light & Power Co. Inc.	✓	
34	Davao Light and Power Company	✓		82	San Jose Electric Cooperative, Inc.	✓	
35	Don Orestes Romualdez Electric Cooperative, Inc.	✓		83	Sorsogon II Electric Cooperative Inc.	✓	

No.	Distribution Utility/ Economic Zone	RCOA	GEOP	No.	Distribution Utility/ Economic Zone	RCOA	GEOP
36	First Bukidnon Electric Cooperative, Inc.	✓		84	South Cotabato I Electric Cooperative, Inc.	✓	
37	Formosa Power Supply Corp.	✓		85	Subic Enerzone Corp.	✓	
38	Iligan Light & Power, Inc.	✓	✓	86	Surigao del Norte Electric Cooperative, Inc.	✓	
39	Ilocos Norte Electric Cooperative, Inc.	✓	✓	87	Surigao del Sur I Electric Cooperative, Inc.	✓	
40	Ilocos Sur Electric Cooperative, Inc.	✓	✓	88	Surigao del Sur II Electric Cooperative, Inc.	✓	
41	Iloilo I Electric Cooperative, Inc.	✓		89	Tarlac Electric, Inc.	✓	✓
42	Iloilo III Electric Cooperative, Inc.	✓		90	Tarlac I Electric Cooperative, Inc.	✓	✓
43	Isabela I Electric Cooperative, Inc.	✓		91	Tarlac II Electric Cooperative, Inc.	✓	✓
44	Isabela II Electric Cooperative	✓	✓	92	Visayan Electric Company, Inc.	✓	✓
45	La Union Electric Company, Inc.	✓	✓	93	Zambales I Electric Cooperative, Inc.	✓	
46	La Union Electric Cooperative, Inc.	✓		94	Zamboanga City Electric Cooperative, Inc.	✓	
47	Lanao del Norte Electric Cooperative, Inc.	✓		95	Zamboanga del Norte Electric Cooperative, Inc.	✓	
48	Leyte II Electric Cooperative	✓		96	National Grid Corporation of the Philippines[14]	✓	

[14] For Directly Connected Customers