Retail Market Assessment Report for 4th Quarter of 2024

26 September to 25 December 2024

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Philippine Electricity Market Corporation –
Market Assessment Group
and approved by the
Market Surveillance Committee

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EXECUTIVE SUMMARY

Retail Competition and Open Access (RCOA)

Contestable Customer (CC)

There were recorded sixty (60) initial switches[1], transfer of three (3) Contestable Customers (CCs) from RCOA to Green Energy Option Program (GEOP), and seven (7) cessations yielding to an additional fifty (50) registered CCs as of end of the 4th quarter of 2024, thereby raising the total tally of registered CCs in the market to 2,156, which is equivalent to 59% of the entire population of eligible end-users.

By region, 87% of the total registrants were from Luzon, while the remaining 12% and 1% were from Visayas and Mindanao, respectively. By industry type, 54% of the registrants were categorized as commercial customers while 46% were industrial customers.

Retail Electricity Suppliers (RES)

33 out of 44 registered RES and 2 out of 15 registered Local RES have active or subsisting contracts with CC/s.

Market Concentration (based on the number of CCs served and energy consumption)

In terms of major participant grouping, calculations based on the Herfindahl-Hirschman Index (HHI) indicated that for the 4th quarter of 2024, The market remained unchanged during the reviewed billing quarter, as the HHI levels remain concentrated

The Four-Firm Index (C4) values for the major participant groups have continued to decline below the 80% mark, indicating a less concentrated market compared to previous periods. This downward trend, observed since Q4 2023, has shifted market concentration from high to medium.

The MERALCO Group remained the top group in terms of the number of CCs served at 33%, the same level during the previous quarter. In terms of CC consumption, the Aboitiz Group remained to be on top, serving 26% of the total consumption of CCs.

Looking at the individual suppliers, an overall decline in HHI values has been observed since the 4th quarter of 2023. Using the new threshold for market concentration[2], it was noted that the market is no longer concentrated in terms of both the number of CCs engaged and the energy consumption served. This contrasts with the findings at the major participant group (MPG) level, where suppliers operate independently from their affiliate MPGs, fostering healthier competition among suppliers. Meanwhile, C4 value remained high at 59% in terms of the number of CCs and energy consumption served, which indicates a high level of control by only four (4) suppliers.

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[1] Commercial transfer of CC from the DU as its supplier under regulated service to a Supplier.

[2] HHI measures the degree of market concentration. Defined as the sum of the Suppliers' market share, the HHI threshold are as follows:

HHI < 1,500 - not concentrated

Greater than 1,500 up to 2,500 - concentrated

Greater than 2500 - highly concentrated

Retail Rate and Estimated Savings

The Weighted-Average Retail Generation Rates[3] is 7% lower compared to DU[4] Average Generation Rates. This rate reduction was experienced by the participants engaged in a supplier in the RCOA.

In terms of estimated savings for the 4th quarter of 2024, CCs experienced an estimated total savings[5] of PHP 2.37 Billion.

Green Energy Option Program (GEOP)

Green Energy Option Program End-Users (GEOP End-Users)

There were ninety-five (95) additional recorded initial switches[6] to become registered GEOP End-Users, equivalent to a 44% increase from the previous quarter, with a total tally of registered GEOP End-Users in the market at 515 – 3.5% of the registered GEOP End-Users were within the RCOA threshold.

By region, majority (about 82%) of GEOP End-users were located in Luzon, while the remaining 12% were from Visayas. By industry type, 76% of the registrants were categorized as commercial customers while 24% were industrial customers.

Renewable Energy Supplier (RE Supplier)

There were 18 registered RE Suppliers, 1 Local RE Supplier, and 16 Suppliers of Last Resort (SoLRs), with 56% of registered RE Suppliers actively serving GEOP End-Users.

Market Concentration (based on the number of GEOP End-Users served and energy consumption)

By MPG, HHI indicated that the 4th quarter of 2024 remained a highly concentrated market in terms of both the no. of GEOP End-Users engaged and energy consumption served, both of which continued to increase since June 2024.

The C4 concentration ratio exceeded 95% during the period, indicating that the market is dominated by only four MPGs. This suggests an oligopoly with limited competition and consumer options, allowing these firms to significantly influence prices and market conditions.

The Ayala group continued to expand its market share, reaching 64% in terms of no. of GEOP End-Users engaged and 62% in terms of energy consumptions served.

On a per RE Supplier basis, similar with the per MPG bases, HHI values have continued to increase since June 2024, leading to the market reaching a highly

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[3] Based on ERC's CREM report.
[4] MERALCO, VECO, and TEI.
[5] Calculated by determining the difference between the weighted-average retail rate and the DU average generation rate. The difference was then multiplied by the monthly consumption of Contestable Customers.
[6] Commercial transfer of a GEOP End-User from the DU as its supplier under captive service to an RE Supplier.

concentrated level in both the no. of GEOP End-Users engaged and the energy consumptions served.

C4 values also increased, reaching 84% in terms of no. of GEOP End-Users and 82% in terms of energy consumption served by GEOP End-Users served by the top 4 suppliers.

Consumption per Franchise Area Location

MERALCO's franchise area accounted for 71% of GEOP energy consumption, driven by its large commercial base, while VECO followed with 15%, showing steady growth in Metro Cebu. The remaining 14% is dispersed across smaller franchise areas, indicating limited but expanding adoption. Within MERALCO's area, the Ayala Group dominates with 69% market share, followed by the EDC Group at 19%, reflecting a concentrated supplier market.

Market Transactions[7]

On a monthly basis, a portion (less than 1%) of the energy served in the program includes purchases from the spot market. Although small in percentage share, some of the energy supplied provided to end-users under the GEOP may not be entirely from renewable sources.

[7] In terms of bilateral contract quantity and spot quantity

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1. RETAIL COMPETITION AND OPEN ACCESS

This portion provides an assessment on the implementation of the RCOA for the 4th quarter of 2024 (26 September 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

Similar to the previous quarter, the retail electricity market experienced an increase in the number of CCs with an additional fifty (50) net increase in the total customers during the billing quarter, indicating continued market participation. This represents the recorded sixty (60) initial switches[8] of new CCs joining the market, transfer of three (3) CCs from RCOA to GEOP, and seven (7) cessations.

By the end of the 4th quarter of 2024, a total of 2,156 CCs, or approximately 59% of the eligible end-user[9] population, had registered in the market.

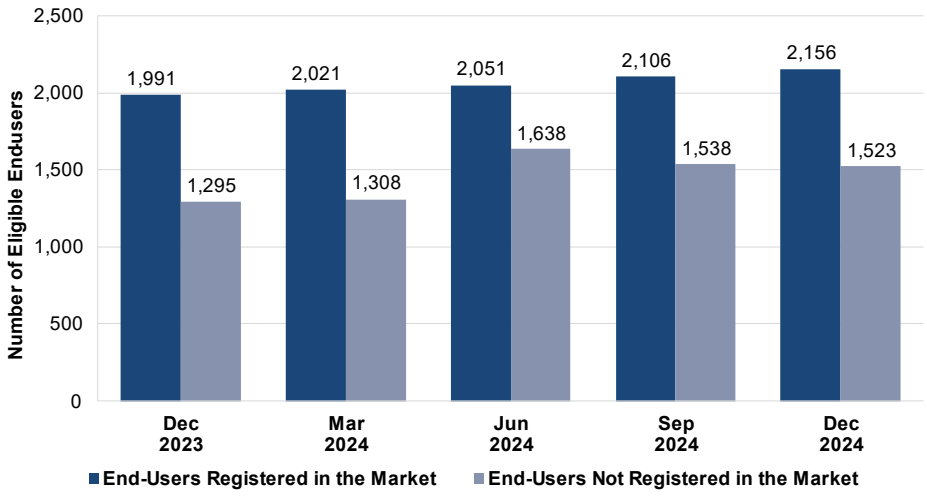


Figure 1. Cumulative Number of Eligible End-Users, 2023-Q4 to 2024-Q4

[8] Commercial transfer of CCs from the DU as its supplier under regulated service to a Supplier.
[9] End-user that has met the eligibility threshold set by the Energy Regulatory Commission (ERC), based on a single revenue meter which are given a choice to switch to the Retail Electricity Market.

1.1.1.2. Per Threshold

This section provides a breakdown of the total number of CCs by contestability threshold. Out of the 2,156 CCs registered in the market, the majority had an average peak demand of 1 MW and above, accounting for 1,310 registrants or approximately 61%. This was followed by CCs under 750-999kW threshold, representing 21% or 449 registered customers, and CCs under 500-749kW threshold, comprising 18% or 397 registered customers.

However, a closer look reveals that most entrants come from the lowest contestability threshold of 500-749kW, a trend observed since the 4th Quarter of the previous year as shown in Figure 2.

Even though most CCs fall within the 1MW and above threshold, majority of new CCs entering the RCOA belong to the 500-749kW category. This suggests that more small customers are exploring the market and lowering the contestability threshold could encourage greater participation from small and medium-sized customers.

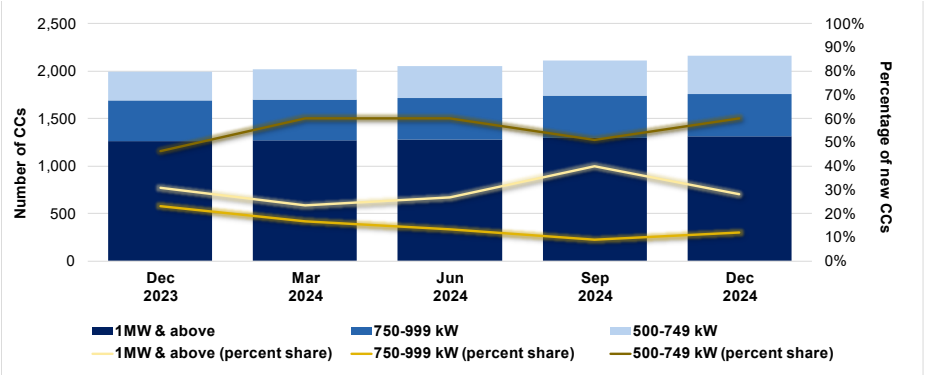


Figure 2. Cumulative Number of CCs per Threshold, 2023-Q4 to 2024-Q4

1.1.1.3. Per Location

Luzon has the highest concentration of CCs, with 87% (1,867 CCs) located in Luzon, while the remaining 12% (262 CCs) are in Visayas. This distribution is consistent with observations from the previous quarters. Since the commercial operation of RCOA in Mindanao in March 2024, the number of CCs has increased to twenty-seven (27) as of the 4th quarter of 2024.

Looking at the location of CCs per region, as shown in Figure 3, CCs registered under the RCOA are concentrated in the metropolitan areas of each region, specifically the Greater Manila Area (for Luzon) and Metro Cebu (for Visayas). A similar pattern is observed in Mindanao, where CCs are primarily located in Davao, the region's main metropolitan area.

Additionally, the slow pace of expansion of program in Visayas and Mindanao suggests the need for improved awareness campaigns to encourage eligible customers, especially in Mindanao, to participate.

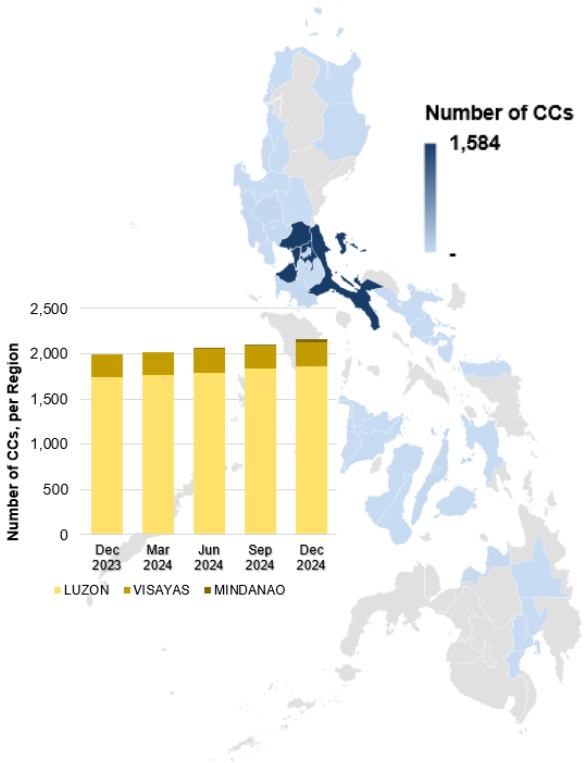


Figure 3. Cumulative Number of CCs Per Region, 2023-Q4 to 2024-Q4

1.1.1.4. Per Retail Activity[10]

In terms of the delineation between the industrial and commercial sectors, approximately 54% of the CCs were classified as commercial consumers, while the remaining 46% were industrial consumers. This distribution remains consistent with past observations.

It was also observed that most of the CCs registered during the period came from the commercial sector. This aligns with the increase in CCs within the 500-749kW threshold, as most CCs in this range belong to the commercial industry.

Although no significant changes were observed during the reviewed billing quarter, there is a continuing trend of more commercial-sector customers entering the market, as new commercial establishments (such as malls, hotels, and condominiums) are being built more than manufacturing plants. Additionally, industrial establishments, particularly large-scale plants, require consistent energy delivery. In contrast, commercial establishments tend to have more flexible energy requirements.

[10] 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.

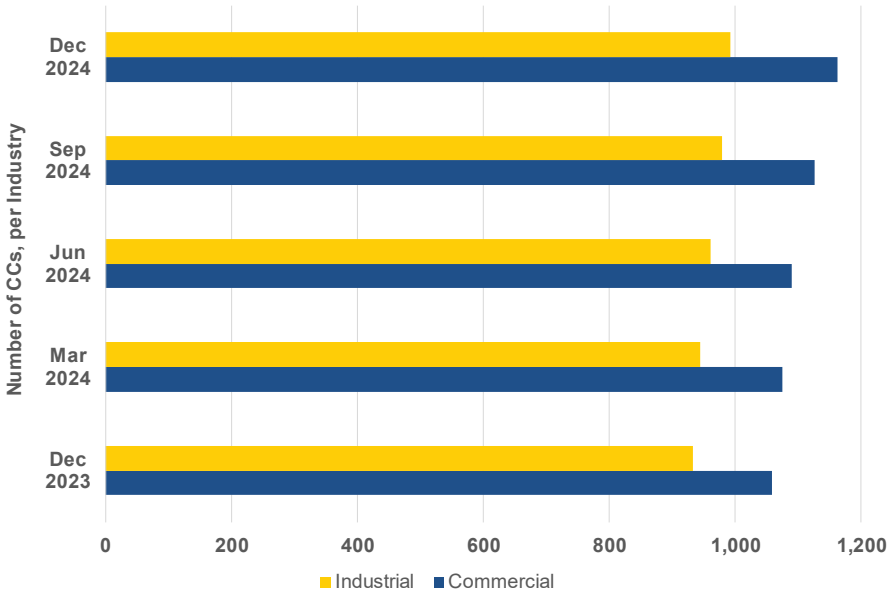


Figure 4. Cumulative Number of CCs Per Retail Activity, 2023-Q4 to 2024-Q4

1.1.1.5. Average Consumption

With respect to energy consumption for CCs, Luzon recorded the highest share of average energy consumption during the period, as the region has the greatest number of CCs, provided in Figure 3

The breakdown of consumption levels based on the average metered quantity (MQ)[11] for the 4th quarter of 2024, as shown in Figure 5, indicates that approximately 68.11% of registered CCs had an average energy consumption of 1MWh and below. This is followed by customers that were in the 1 MWh to 5 MWh range, accounting for 28%, while 2.14% were in the 5 MWh to 10 MWh range. The remaining CCs had an average consumption of 10 MWh to 50 MWh.

A comparison with the previous quarter suggests a slight increase in the number of customers consuming 1 MWh or below, while CCs with an average energy consumption above 1MWh to 5MWh saw a slight decline during the period.

Consistent with observations in previous sections, market growth is largely driven by CCs under 500-749W and 750-999kW contestability threshold, as they account for more than half of the consumption recorded during the reviewed billing period. Additionally, the high consumption in Luzon reflects the market maturity in the region, suggesting a focus on expanding the program in Visayas and Mindanao. This could be achieved by conducting more awareness programs to boost participation from customers in these regions.

[11] Average of the total hourly MQ

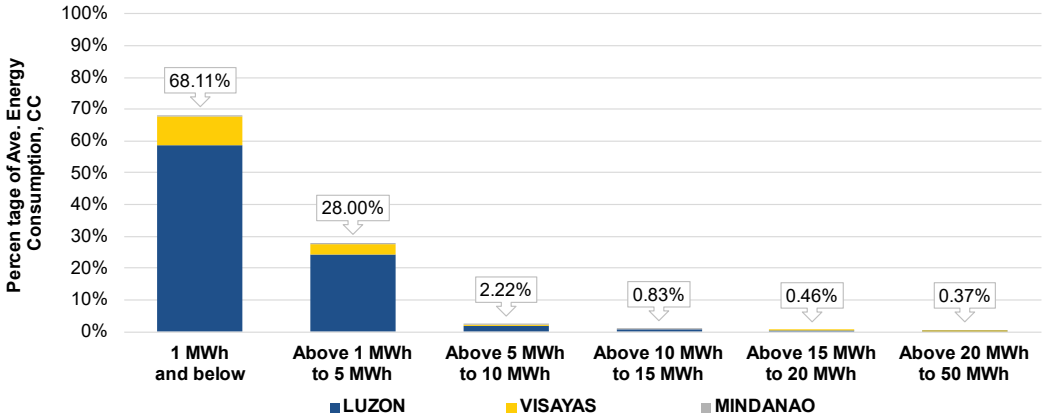


Figure 5. Percentage of Average Energy Consumption of CCs, 2024-Q4

1.1.1.6. Suppliers

Table 1 shows the cumulative number of Suppliers with License from ERC, the number of registered Suppliers per category, and the number of active Suppliers currently serving registered CCs. Majority of the registered RES were actively participating in the market, serving registered Contestable Customers. This highlights that 68% or 34 out of the 50 registered RESs currently have active contracts and supplied energy to CCs. Also, 2 LRESs serves CCs within its franchise area, specifically within MERALCO. Additionally, no CCs were supplied by SoLRs during the reviewed billing quarter.

It should also be highlighted that not all potential suppliers have registered in the market and that some registered RESs still do not have active contracts. Figure 6 shows that a greater number of RESs have no active contracts with CCs compared to those affiliated with MPGs. This may indicate that certain RESs, particularly those without MPG affiliations, face challenges in engaging CCs, as some CCs may tend to prefer established RESs with proven track records.

Table 1. Cumulative Number of Supplier

	Licensed/Authorized	Registered	Serving CCs
RES	57	50	34
LRES	29	15	2
SoLR	48	28	0

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

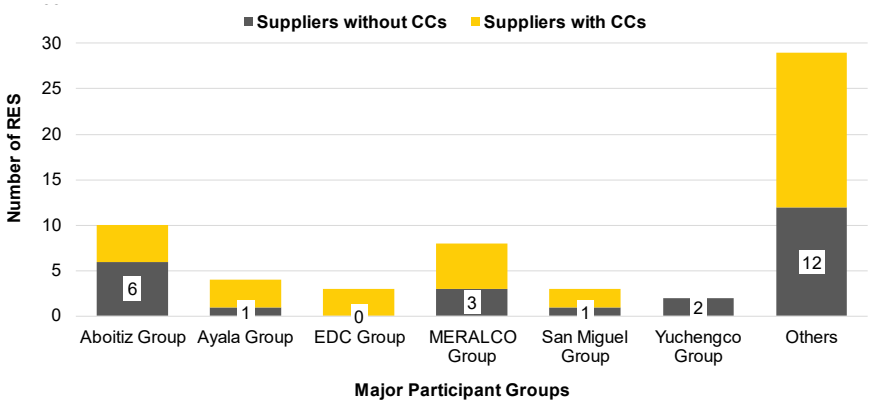


Figure 6. Number of RES With and Without CCs, 2024-Q4

1.2. MARKET SHARE

1.2.1. Supplier Share

1.2.1.1. Share in terms of Number of Contestable Customer and Consumption

This section shows the market share among major participant groupings of Suppliers, as determined by the Energy Regulatory Commission (ERC), in terms of number of CCs and their consumption.

A quarter-on-quarter comparison shows that the MERALCO and Aboitiz groups continue to hold the largest shares of CCs, among all participants. Other major groups—Ayala, San Miguel, and EDC—have generally maintained their customer base compared to the previous quarter, indicating no significant changes in their CC portfolios.

In terms of the market share in number of CCs, the shares from the previous billing quarter remained relatively the same.

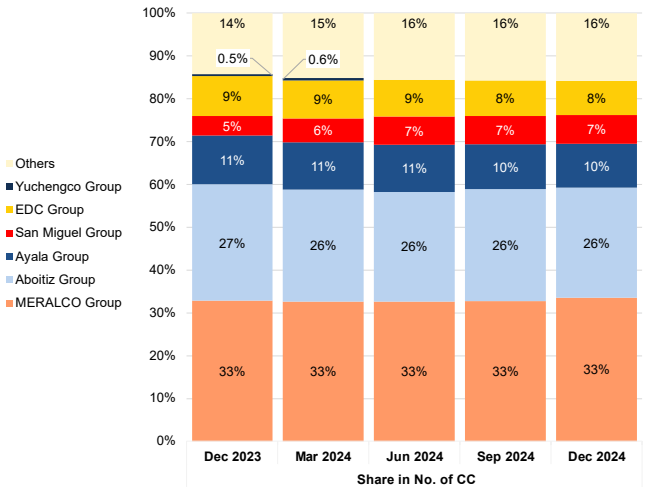


Figure 7. Share in Number of CCs Per Major Participant Grouping, 2023-Q4 to 2024-Q4

While the MERALCO group holds the most CCs by count, as shown in Figure 7, the share of total energy consumption among major participant groups reveals a different dynamic. In terms of consumption, the Aboitiz group leads with a 28% share of total retail energy consumption served.

This disparity is also evident when looking at the San Miguel Group, as shown in Figure 8. Although its share in the number of CCs is smaller than that of the Ayala Group, San Miguel Group surpasses Ayala in terms of consumption share. This suggests that CCs under San Miguel Group consist of larger consumers with higher energy needs. In contrast, customer base of Ayala Group might consist of smaller consumers, which results in a lower overall consumption share despite a larger number of CCs.

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

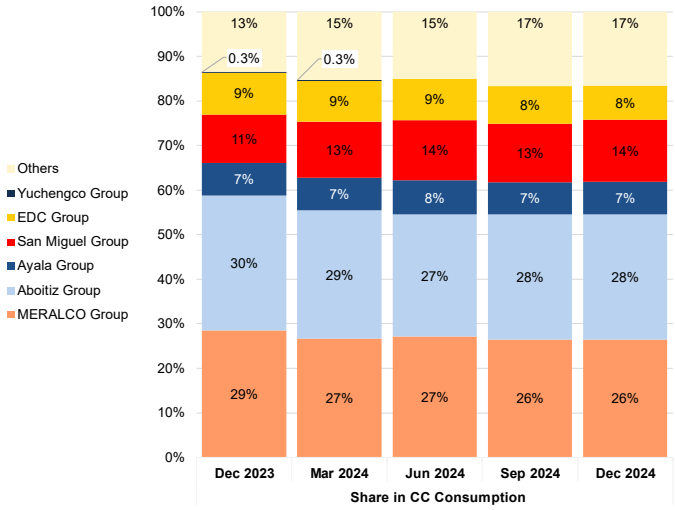


Figure 8. Share in CCs' Total Energy Consumption Per Major Participant Grouping, 2023-Q4 to 2024-Q4

1.2.1.2. Consumption Per Franchise Area Location

Geographically, registered CCs were dispersed throughout the various economic zones and distribution utility franchise areas. Appendix B: List of Distribution Utility Franchise Areas and Economic Zones provides for the complete list of these entities.

Keeping with the trend from previous quarters, about 68% of registered CCs' total consumption, as shown in Figure 9(a), was within MERALCO's franchise area. Meanwhile, 8% were CCs who were directly connected to the transmission grid, 6% were within the VECO franchise area, and the remaining 18% were scattered throughout the other franchise areas and economic zones. This suggests that Visayas and other regions have relatively smaller contestable demand as compared to the Luzon region.

Moreover, it should be noted that not all CCs within MERALCO's franchise area were served by the MERALCO Group. As shown in Figure 9(b), some of the CCs opted for other Suppliers to meet their energy needs, and only 33% of the total consumption within the MERALCO franchise area was supplied by the MERALCO group with many CCs opting for alternative suppliers such as the Aboitiz Group (23%), San Miguel Group (12%), Ayala Group (9%),and EDC Group (8%).

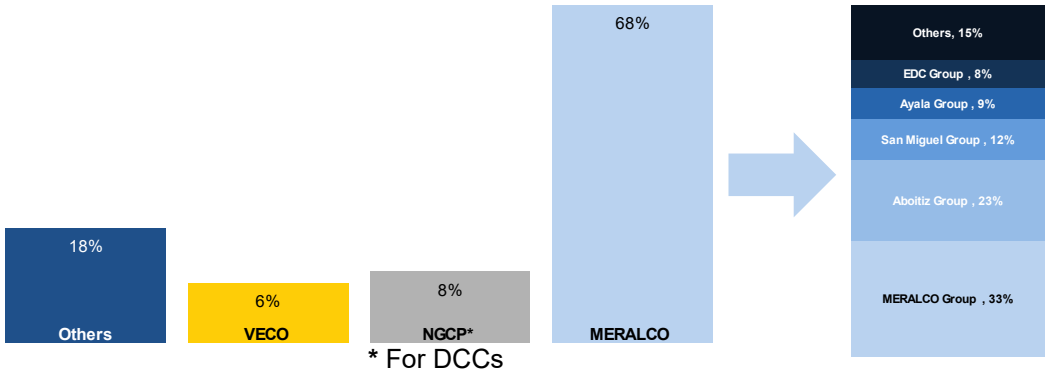


Figure 9. (a) **Figure 9. (b)**

Figure 9. (a) Share in CCs' Energy Consumption by Franchise Area, 2024-Q4; (b) Share in CCs' Energy Consumption by Supplier within MERALCO Franchise Area, 2024-Q4

1.2.2. Market Concentration

1.2.2.1. Herfindahl–Hirschman Index (HHI)

This section discusses the market concentration based on the contracted number of CCs and the energy consumption served. Figure 10 shows the level of market concentration using the Herfindahl-Hirschman Index (HHI)[12], based on the shares determined in Section 1.2.1.1.

Similar to the observations on market share for both the number of CCs and their total consumption, the market remained unchanged during the reviewed billing quarter, as the HHI levels remain concentrated as shown in figure 10.

[12] HHI measures the degree of market concentration. Defined as the sum of the Suppliers' market share, the HHI threshold are as follows:
HHI < 1,500 - not concentrated
Greater than 1,500 up to 2,500 - concentrated
Greater than 2500 - highly concentrated

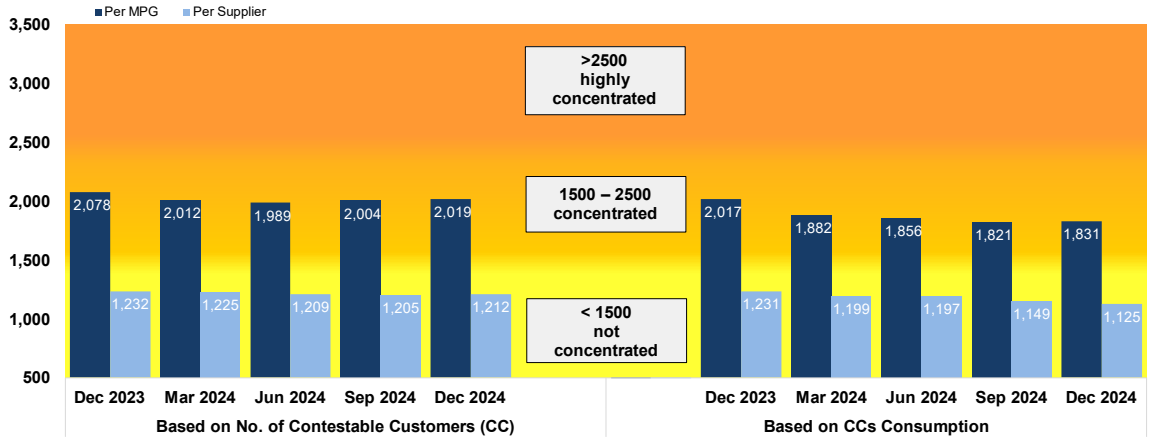


Figure 10. HHI Values, 2023-Q4 to 2024-Q4

1.2.2.2. Four-Firm Concentration Index (C4)[13]

The four-firm index (C4) considers both the number of CCs served and their consumption levels, grouped by major participants. As shown in Figure 11, C4 values for the major participant groups have continued to decline below the 80% mark, indicating a less concentrated market compared to previous periods. This downward trend, observed since Q4 2023, has shifted market concentration from high to medium.

However, on a per supplier basis, the overall market can still be considered an oligopoly, meaning that a small number of suppliers (the top 4) still control more than 50% of the market share. Nonetheless, a slight decline in C4 values—now dipping below 60%—suggests increasing competition, as CCs become more knowledgeable about where and how to procure their electricity.

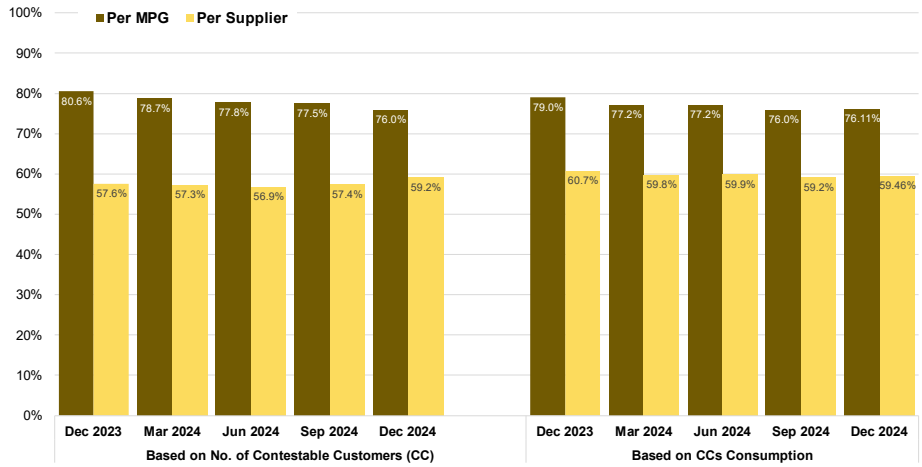


Figure 11. Four-Firm Index, 2023-Q4 to 2024-Q4

[13] C4 measures the percentage of 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 12 shows the degree of integration among the Suppliers, Generation Companies, and Distribution Utilities as of 25 December 2024[14]. The Supplier structure shows that most of the RESs are affiliated with Generation Companies. Additionally, some Suppliers had affiliations with other Suppliers, Distribution Utilities (DUs), or both, suggesting a vertically integrated structure that helps mitigate market volatility and supply chain disruptions.

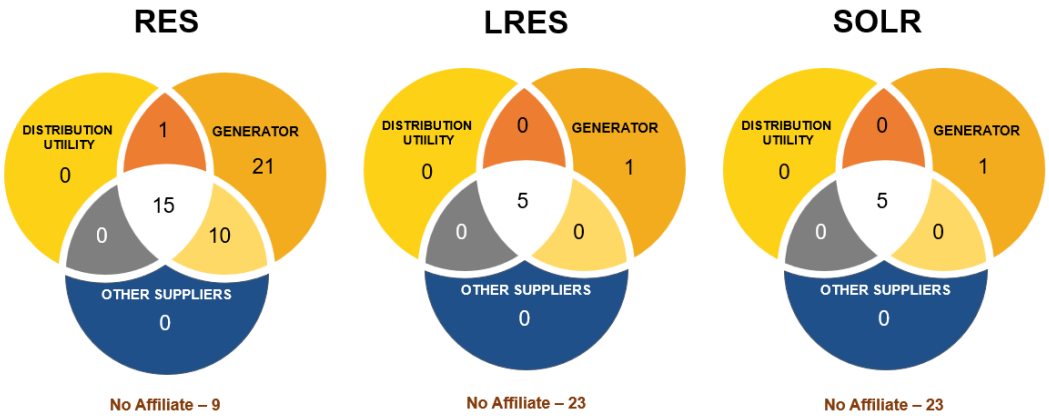


Figure 12. Summary of Suppliers with Affiliate Generation Companies, Suppliers and Distribution Utilities

Note that one Supplier may have multiple affiliate Generation Companies, Suppliers, and/or Distribution Utilities.

These affiliations could be driven by a range of strategic factors, such as ensuring a more reliable electricity source, expanding business operations, or influencing the overall competitiveness in the market.

Most RESs are affiliated with generators, and some with DUs, and other suppliers. Such integration allows for better coordination between production and distribution, minimizing disruptions. Additionally, it can create operational efficiencies that lower costs for suppliers, though these savings may not always translate to lower prices for CCs, as competitive dynamics and contractual terms influence pricing structures.

While all 23 unaffiliated local RESs are registered, none are currently serving any CC. This gap in market penetration does not necessarily equate to a negative effect on the market. Possibly, their initial focus is on fulfilling their core mandate of electricity distribution, rather than acting as a supplier at this time.

[14] Based on latest available ERC data.

1.2.3.2. Vertical Integration

This measures the vertical integration of the generation companies and their affiliated Suppliers in the RCOA Market. Regarding the generation and supply in terms of major participant grouping, Figure 13 provides for the comparison of the total generation per major participant grouping in the Wholesale Electricity Spot Market (WESM) in relation to the total energy supplied by their affiliated Suppliers.

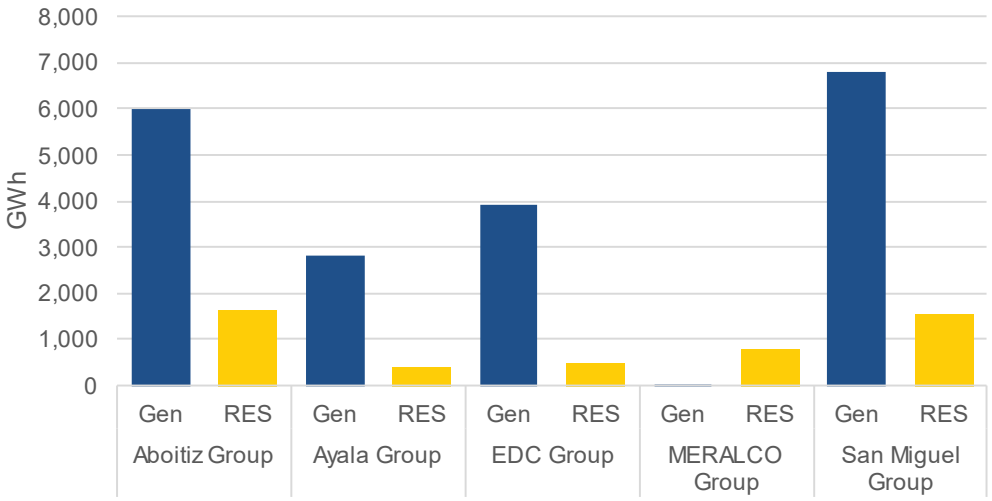


Figure 13. Generated Energy vs Supply Requirement, 2024-Q4

For all the major participant groups, their supply requirement aligns with their generated energy, with one exception. MERALCO shows a substantial difference in the ratio of generated energy from its generation subsidiary to its supply business segment, as seen in Figure 13. While Aboitiz, Ayala, EDC, and San Miguel groups are primarily engaged in energy generation. This is because MERALCO is primarily established for the distribution of electricity to end-users.

This analysis underscores distinctive patterns in energy dynamics among these entities in the sector. However, it should be noted that Figure 13 does not necessarily translate that energy supplied by the supplier counterparts was directly sourced from their affiliates' generation.

1.3. MARKET PERFORMANCE

1.3.1. Energy Consumption

1.3.1.1. Total Energy Consumption

Figure 14 shows total energy consumption on a quarter-on-quarter basis for all End-users, including the Green Energy Option Program (GEOP) End-Users and registered CCs. The demand for electricity and the increase in the number of participants in the retail market are the two factors that affect these statistics.

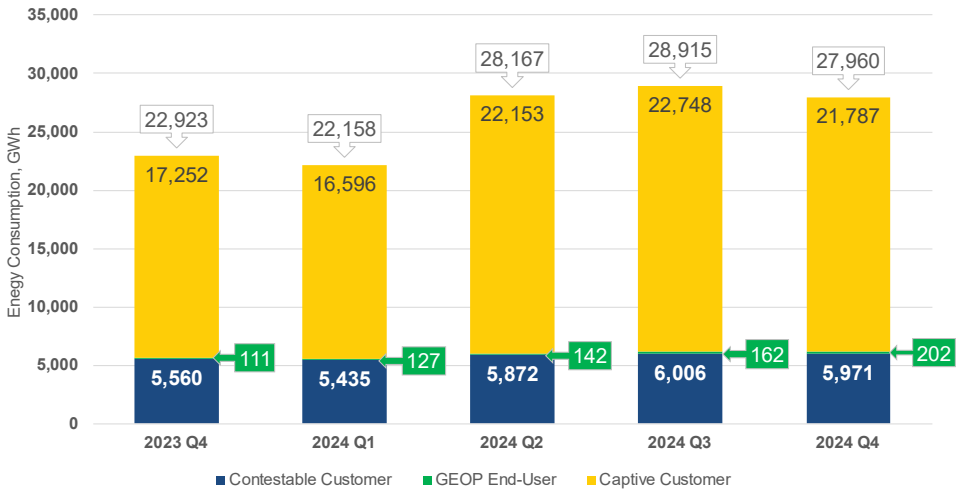


Figure 14. Total Energy Consumption (in GWh), 2023-Q4 to 2024-Q4

Looking at the movement on a quarter-on-quarter basis, an increase in the total system consumption was noted since the 2nd quarter of 2024. However, a slight dip in the 4th quarter of 2024 was observed as the holiday season started during this period. For the retail market, apart from the holiday season, the increase may be related to the number of participants joining the program.

1.3.1.2. Monthly Energy Consumption

As to more details on the CC consumption per industry type, Figure 15 shows the month-on-month consumption of consumers for the covered billing periods.

During the 4th quarter of 2024, a fluctuating trend can be observed in the 3-month comparison due to several factors. The decline in October can be attributed to the impact of Typhoon Kristine in late October. The increase in November was driven by the start of the holiday season, as celebrations and the use of electronic Christmas decorations began to ramp up. The subsequent decline in December can be linked to downtime in the commercial and industrial sectors as businesses observed holidays that affects business operations.

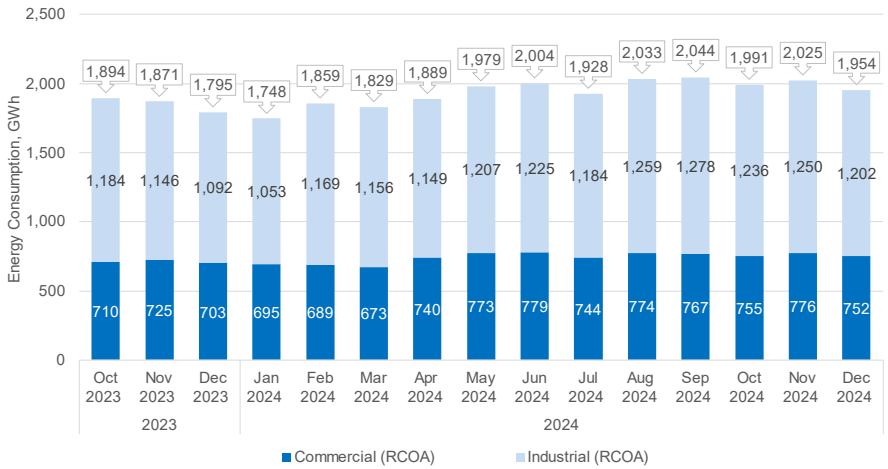


Figure 15. Total Energy Consumption by Industry Type (in GWh), October 2023 to December 2024

1.3.2. Load Profile

1.3.2.1. Hourly Energy Consumption Profile

As depicted in Figure 16, the electricity consumption patterns of industrial CCs revealed no significant fluctuations between peak and off-peak periods. However, it consistently exhibited troughs during specific intervals at 0600h, 1300h, and 1900h for each series. This observation strongly suggests that these industrial customers operate on a three-shift schedule and/or breaktime.

In terms of a month-on-month comparison, significant fluctuations can be observed during the 4th quarter of 2024 with October having the highest average energy consumption during the review period. December 2024 recorded the lowest energy consumption in line with the previous observation that industrial sectors also observe holiday breaks during this period.

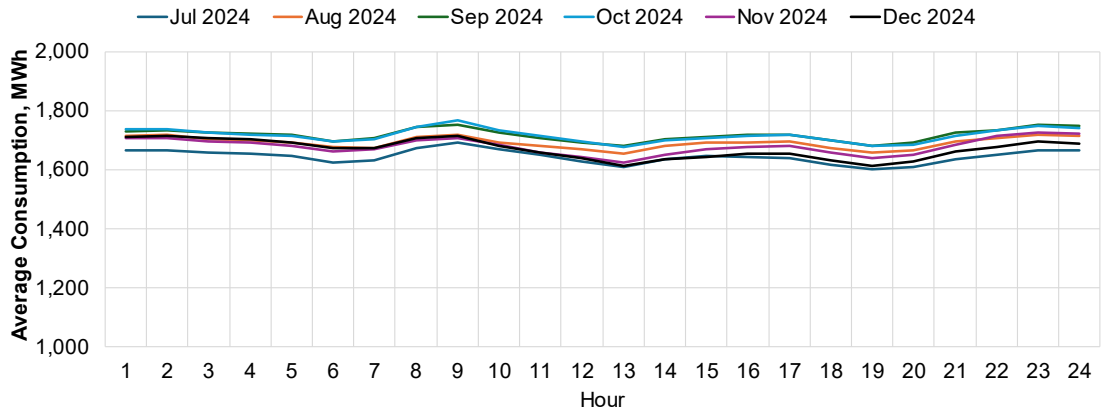


Figure 16. Hourly Average Energy Consumption (in MWh), Industrial, July to December 2024

Figure 17 illustrates the 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 the peak consumption observed. Compared with the preceding quarter, there was no significant variation in the demand for commercial CCs throughout the billing periods covered in this report.

It can be observed that average energy consumption in December 2024 increased after 2000h. This is likely due to increased lighting and energy used by commercial and residential consumers during the holiday season, with commercial Christmas decorations remaining lit until midnight as a contributory factor. Additionally, some establishments extended their operating hours to accommodate the usual rise in economic activity during the holiday season.

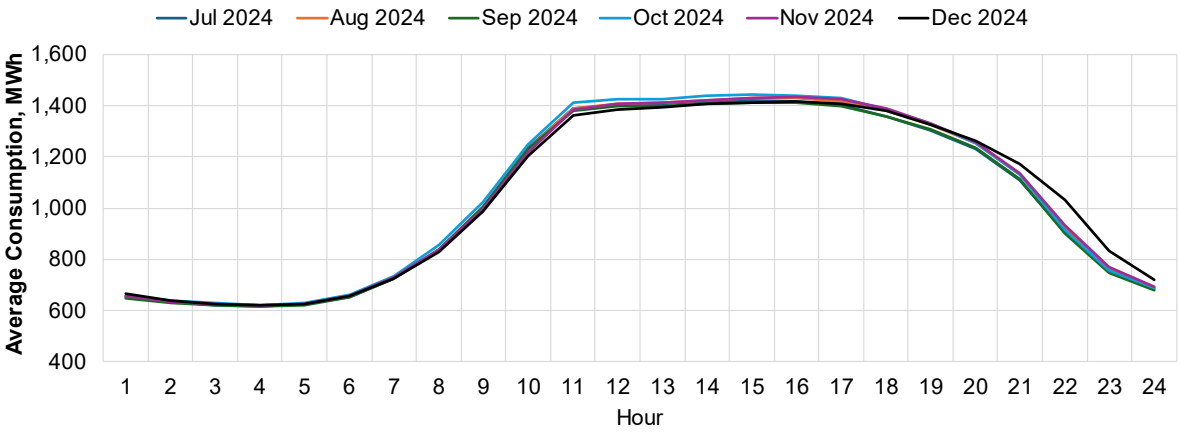


Figure 17. Hourly Average Energy Consumption (in MWh), Commercial, July to December 2024

1.3.2.2. Load Factor

Figure 18 shows the monthly load factor[15] of registered CCs, which was calculated based on their actual electricity consumption (total consumption over the maximum consumption and the total number of hours for the billing period). Registered CCs maintained relatively the same load factors throughout 2024, with a decreasing trend for November and December showing a gradual decline. This was due to the industrial sector reducing operations during the holiday season. The consistent load factor throughout the year, apart from seasonal variations, indicates that CCs maintain steady energy utilization. This stability is driven by the entry of new CCs, which exhibit similar consumption patterns to existing CCs in the RCOA, as reflected in their load profiles shown in Figures 16 and 17.

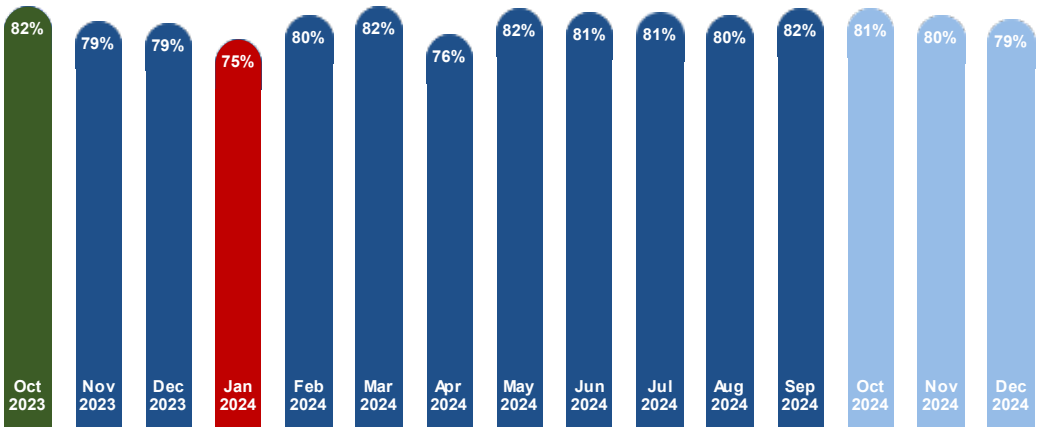


Figure 18. Load Factor, July 2023 to September 2024

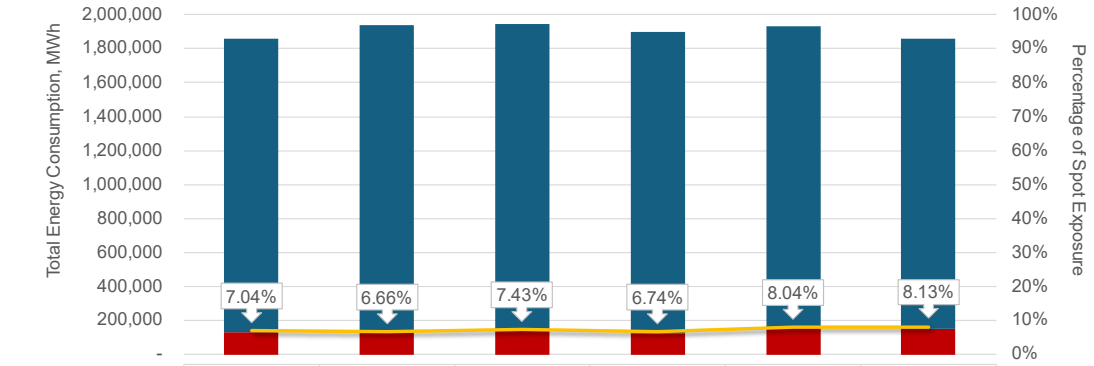
[15] Load Factor is calculated as total consumption per industry type divided by the maximum hourly consumption multiplied by the total number of hours.

1.4. RETAIL ACTIVITY

1.4.1. Market Transactions

This section provides an analysis of the share of energy served within the RCOA. As illustrated in Figure 19, there was a slight upward trend in spot market purchases, with the highest spot exposure occurring in December 2024, accounting for 8.13% of total energy coming from WESM. However, based on energy consumption, November had the highest spot quantity, with 155.04 GWh during the period. The percentage of spot exposure during the 4th quarter of 2024 increased as the total bilateral contract quantity (BCQ) declared by the suppliers of CCs decreased, resulting in a higher ratio of spot exposure.

In conclusion, the RCOA predominantly relies on energy served under bilateral contract agreements, which enables suppliers to negotiate lower and fixed retail prices, providing stability and predictability for both suppliers and customers.



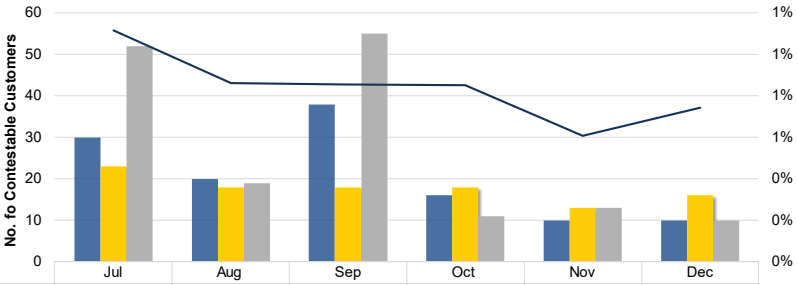
	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24
BCQ (MWh)	1,728,203.65	1,811,676.92	1,798,405.75	1,768,591.78	1,774,267.38	1,710,579.49
Spot Qty (MWh)	130,958.68	129,183.31	144,405.18	127,760.37	155,039.95	151,343.24
Spot Exposure	7.04%	6.66%	7.43%	6.74%	8.04%	8.13%

Figure 19. RCOA Market Transaction, July to December 2024

1.4.2. Customer Switching Rate

Based on the historical switching rate among registered CCs as shown in Figure 20, there were forty-seven (47) instances of customers switching from one supplier to another during the billing months of October to December 2024. Of these, twenty (20) switches occurred between a supplier's affiliates, indicating a strategic move within the same corporate group to optimize contract terms or service offerings.

A significant driver behind these switches was the expiry and non-renewal of contracts, accounting for thirty-four (34) of the total switches. Additionally, fifteen (15) switches resulted in a lower retail rate as some CCs opted to switch to MPGs with lower rates, as shown in Figure 21. This suggests that customers are evaluating their options and opting to switch suppliers for better rates or services.



	Jul	Aug	Sep	Oct	Nov	Dec
2023	30	20	38	16	10	10
2024	23	18	18	18	13	16
2024 Projected Switch*	52	19	55	11	13	10
Customer Switch Rate	1.11%	0.86%	0.85%	0.85%	0.61%	0.74%

Figure 20. Switching Rate, July to December 2024

*Projected Switch – CCs with projected contract expiration during the billing period

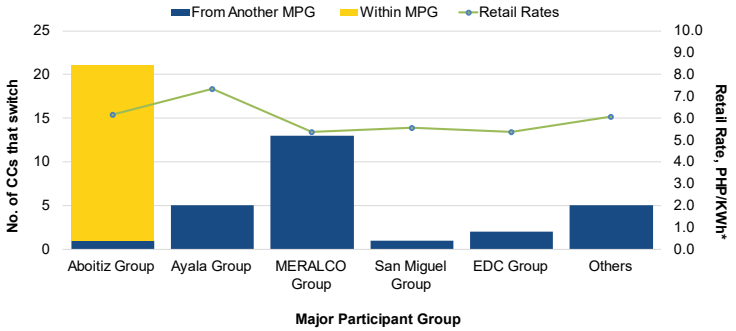


Figure 21. Switches relating to Major Participant Groups, 2024-Q4

Looking at customer retention, churn, and net growth rates of MPGs helps compare their performance and analyze competitiveness among suppliers in acquiring and retaining CCs. As shown in Figure 22, Aboitiz, MERALCO, and San Miguel Groups demonstrated a strong ability to retain CCs and attract new customers, as their retention rates exceed 100% and their net growth rates are positive. Additionally, their low churn rates indicate minimal customer loss.

On the other hand, EDC Group is experiencing a decline in CCs, with a net growth rate of -2.89%, a lower retention rate compared to other MPGs, and a higher rate of CCs switching to competitors. This intra-MPG movement highlights intense competition in the market, as CCs are being offered better services by multiple MPGs. Furthermore, this analysis provides insight into which groups hold market power in terms of CC movement, ultimately influencing market share dynamics.

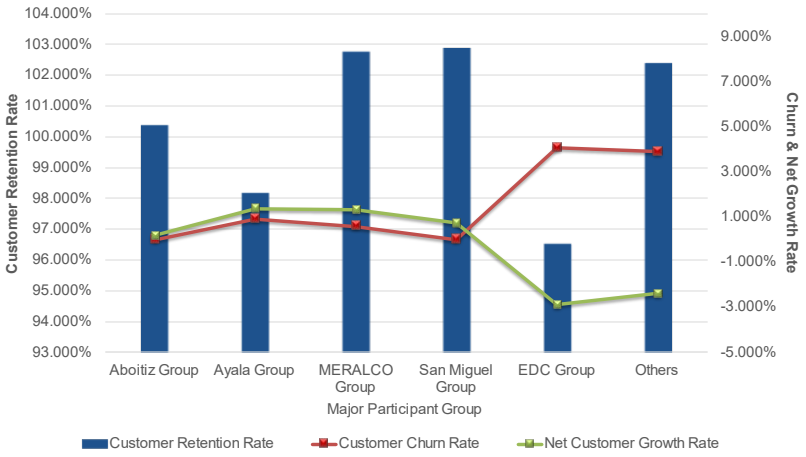


Figure 22. Customer Retention, Churn, and Net Growth Rates Across MPG, September vs December 2024

1.4.3. Retail Rate

Figure 23 shows that DU[16] generation rates experienced a decrease for 2024-Q4, especially in October 2023 and December 2024. With the significant increase in rates from June to July 2024, CCs under the RCOA were protected from the volatility of the DU generation rates with their Weighted-Average Retail Generation Rates[17] (WARGR) consistently under PHP 6.00/kWh.

Figure 23 shows the advantage of CCs under the retail market as the WARGR has a stable trend throughout the 15-month period compared to when they remain as a captive customer which subject themselves to high volatility of DU rates as they are exposed to several factors including market driven fuel costs, fluctuations in seasonal demand, regulatory adjustments, and exposure to WESM.

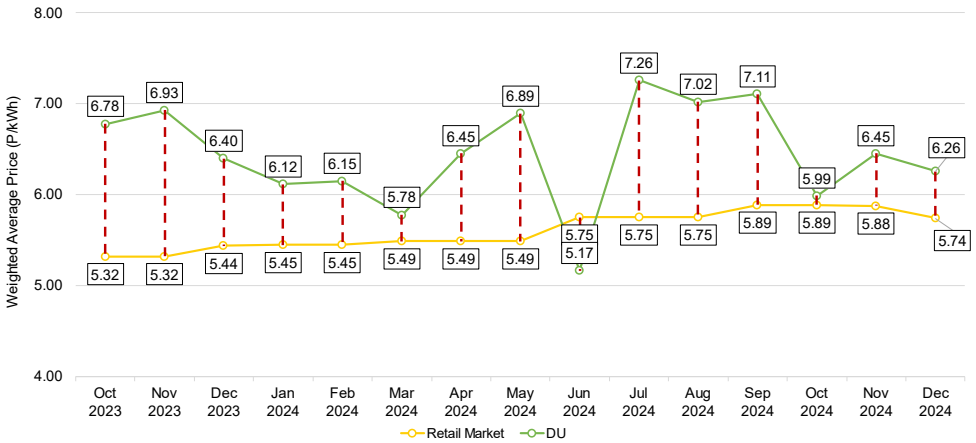


Figure 23. DU Average Generation Rate vs Retail Weighted Average Rate, October 2023 to December 2024

[16] MERALCO, VECO and TEI
[17] Based on ERC's CREM report as of December 2024.

1.4.4. Estimated Savings

In continuation of the previous analysis, this section assesses the potential savings incurred by CCs from participating in the retail market, allowing them to hedge against the volatility of DU rates.

For this report, monthly savings were calculated by determining the difference between the WARGR and the DU average generation rates, multiplied by the monthly consumption of CCs. These savings were then aggregated on a quarterly basis. It is important to note that these calculations are based on available data and should be considered estimates.

During the review period, CCs in the retail market experienced an estimated total savings of 2.37 billion Philippine Pesos. This figure represents a 70% decrease compared to the previous quarter. However, this does not imply a negative outcome for the retail market. Instead, it suggests that even when DU rates are relatively low, CCs in the retail market still achieve cost reductions on their energy expenses.

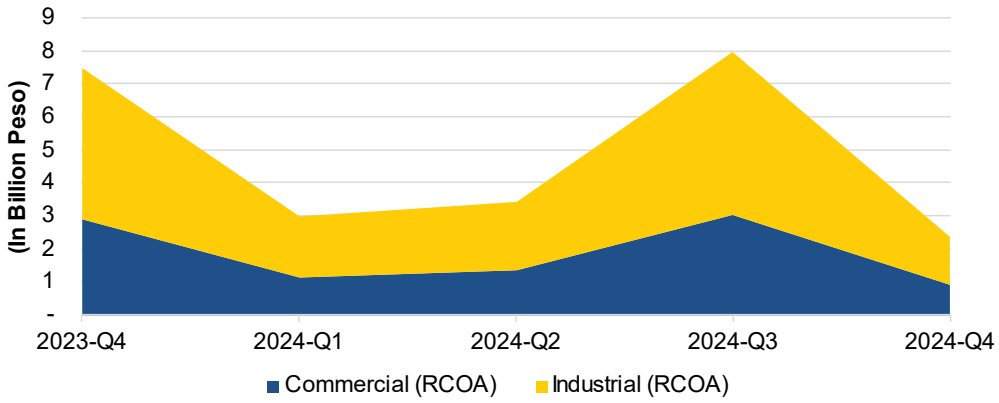


Figure 24. **CC's Monthly Estimated Savings, 2023-Q4 to 2024-Q4**

1.4.4.1. Estimated Savings within MERALCO Franchise Area

In continuation of the analysis provided in the preceding section and considering that the MERALCO franchise area has the largest share of the number of CCs located within its jurisdiction, MERALCO's actual monthly generation rates were used and compared to the WARGR of the MERALCO Group. The difference between the two (2) rates were then calculated and multiplied to the metered quantities for each supplier operating within MERALCO's franchise.

Figure 25 illustrates the estimated monthly savings accrued by the CCs within MERALCO's franchise area. During the 4th quarter of 2024, these CCs participating in the RCOA program saved about 3.7 billion pesos.

They were able to achieve these savings by purchasing electricity at lower prices through the program compared to MERALCO's direct rates. This analysis demonstrates how retail competition can benefit eligible consumers.

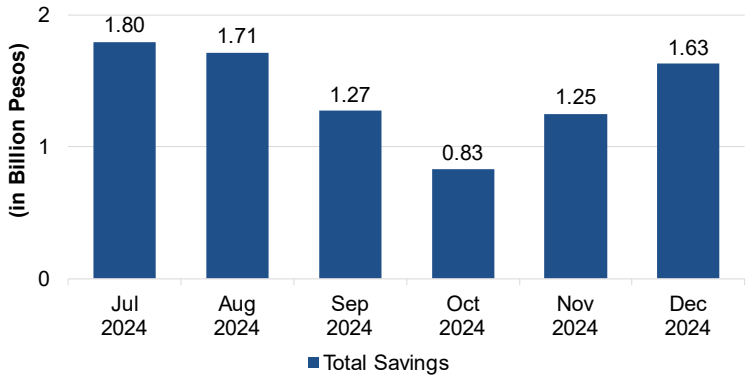


Figure 25. CC's Monthly Estimated Savings, July to December 2024

2. GREEN ENERGY OPTION PROGRAM

This portion provides an assessment on 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. GEOP End-Users

The total number of GEOP End-Users continues to grow, reaching 515 by the end of the 4th quarter of 2024. This represents a 21.75% increase from the previous quarter, demonstrating a steady increase in participation in the program.

Figure 26 illustrates the number of eligible end-users within the 100-499kW threshold, which is currently offered under GEOP. When compared to Figure 1, which shows the eligible end-users under the 500kW and above category, it is evident that there are significantly more eligible end-users in the 100-499kW range. This disparity highlights the substantial market potential for the RCOA market.

The substantial number of eligible end-users in the lower threshold suggests that smaller businesses and customers are now allowed and capable of choosing renewable energy options offered by the GEOP. This trend not only highlights the success of the program in attracting a broader consumer base but also points to a vast market potential for the retail market. Furthermore, the data indicates that as more consumers within the 100-499kW range become aware of and participate in the GEOP, the overall demand and support for renewable energy sources will likely continue to rise, thereby enhancing market dynamics and sustainability efforts within the energy sector.

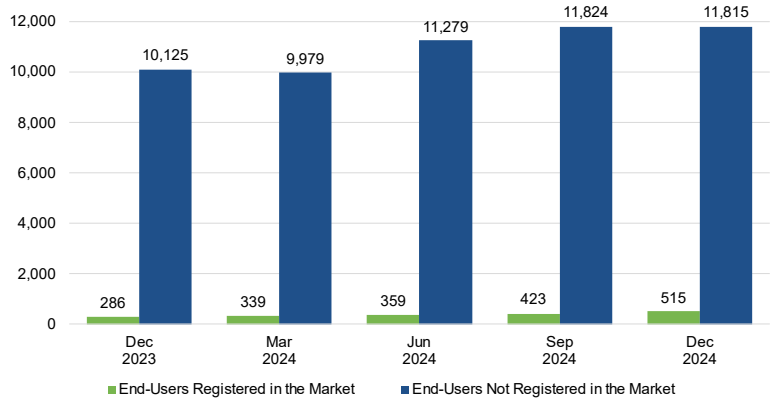


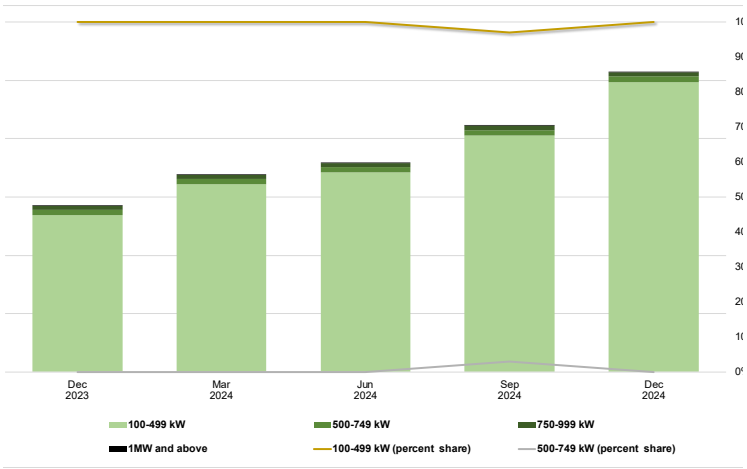
Figure 26. GEOP End-User vs Eligible End-Users under 100-499kW Threshold[18], 2023-Q4 to 2024-Q4

2.1.1.2. Per Threshold

This billing quarter saw a significant surge in market participation, with ninety-five (95) newly registered GEOP End-users, which successfully went through initial switching activities. The 21.75% increase from the previous quarter brings the total number of participants to 515.

3.5% of registered GEOP End-users who fall under the RCOA market thresholds still opted to participate under the GEOP program, which may be related to clean energy advocacies of these entities.

A linear increase in GEOP End-users indicates the continuous growth of the program, with new consumers consistently switching. As shown in Figure 27, most GEOP End-users fall within the 100-499kW contestability range, demonstrating a growing willingness among consumers to participate in the retail market. Since RCOA only allows consumers with a minimum average peak demand of 500kW, GEOP provides an alternative for smaller consumers to experience the benefits of retail competition.



[18] Based on the available data from ERC's Monthly CREM Report

Figure 27. Cumulative Number of GEOP End-users per Threshold, 2023-Q4 to 2024-Q4

2.1.1.3. Per Location

Looking at the geographical distribution of GEOP End-users, as of this billing quarter, majority (82% or 424 participants) were located in Luzon, while the remaining 18% (91 participants) were situated in the Visayas grid, as illustrated in Figure 28. This geographical distribution aligns with observations from both the previous quarter and the RCOA program, noting that Luzon serves as the primary region for both GEOP End-user and CC concentration, especially in the metropolitan areas.

The distribution of GEOP End-users closely mirrors trends observed in the RCOA market, where Luzon has the highest number of GEOP End-Users, followed by Visayas, while Mindanao had lower shares. With 82% of GEOP End-users in Luzon, the familiarity of suppliers and consumers in the program, supplier presence, and awareness drive higher adoption. Meanwhile, Visayas holds only 18% of participants, indicating moderate growth but with potential barriers such as limited supplier engagement and lower awareness. Notably, Mindanao has yet to register any GEOP End-users, despite RCOA seeing new customers in the region, suggesting factors like lack of market outreach that may hinder reception of consumers. These trends highlight the need for targeted awareness campaigns and supplier expansion to encourage greater participation, especially in Visayas and Mindanao.

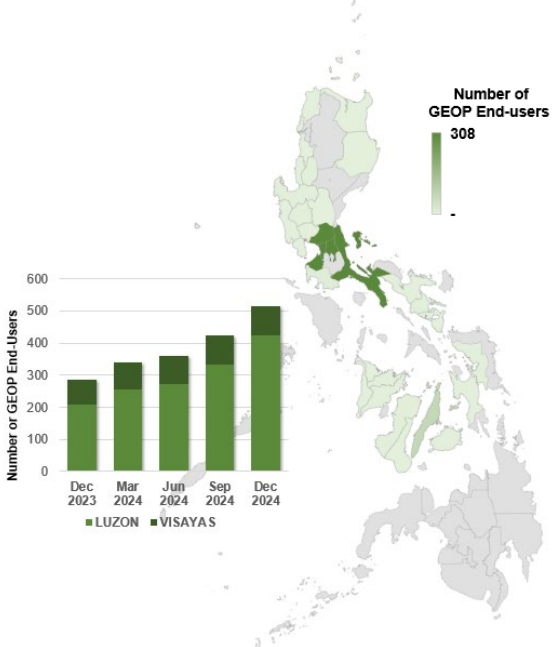


Figure 28. Cumulative Number of GEOP End-users Per Region, 2023-Q4 to 2024-Q4

Note: Retail market is fully operational to the three major grid (Luzon, Visayas, and Mindanao) where WESM is operating[19].

[19] Department of Energy (DOE) Department Circular No. DC2024-03-0009 and Energy Regulatory Commission (ERC) Resolution No. 06, Series of 2024

2.1.1.4. Per Retail Activity

Similar to previous quarters, the distribution of GEOP End-users by industry sector remains consistent. Most of the new entrants in the GEOP came from the commercial sector, accounting for 99% of the new GEOP End-users for the reviewed billing period.

The commercial sector continues to have the highest GEOP participation, accounting for 99% of new End-users, mirroring RCOA trends where commercial customers also form the majority of CCs. This pattern reflects the greater flexibility of businesses in exploring retail energy options, while industrial users—typically with higher demand and existing direct supply agreements—show minimal participation. However, the industrial sectors currently participating in GEOP may have opted for the program due to a preference for sourcing their energy purely from renewable sources, aligning with sustainability goals and corporate social responsibility initiatives. Since these industrial consumers are also eligible for RCOA, their decision to participate in GEOP instead suggests an advocative purpose rather than purely economic considerations. Given that GEOP primarily caters consumers below the 500kW threshold, large industrial firms may still find RCOA or direct contracts more suitable for their operational needs.

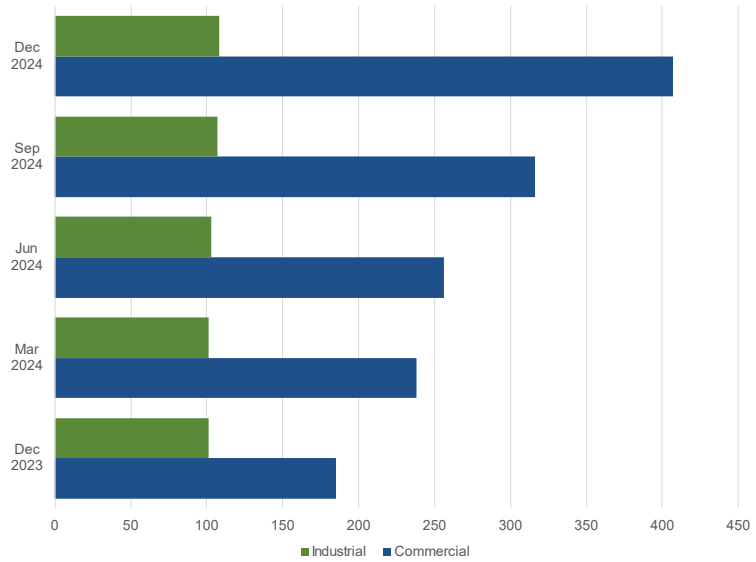


Figure 29. Cumulative Number GEOP End-users Per Retail Activity, 2023-Q4 to 2024-Q4

2.1.1.5. Average Consumption

Figure 30 details the average energy consumption of GEOP End-users for the 4th quarter of 2024, revealing that 98.7% of participants consumed 1MWh or less on average. This confirms that, currently, GEOP primarily serves GEOP End-Users within the 100-499kW contestability threshold. Notably, only seven (7) GEOP End-users registered consumption exceeding 1MWh for all three months of the quarter, representing just 1.3% of participants, highlighting that consumers under 500kW and above are less likely to participate.

Unlike RCOA, where many CCs have higher energy demands, Consumer base within GEOP consists of businesses with lower energy demands. Larger consumers often prefer RCOA for its greater contract flexibility, diverse supplier options, and potentially lower costs, while GEOP appeals to those prioritizing 100% renewable energy. The absence of high-consumption users in GEOP suggests that businesses with larger energy needs continue to favor RCOA or direct power contracts.

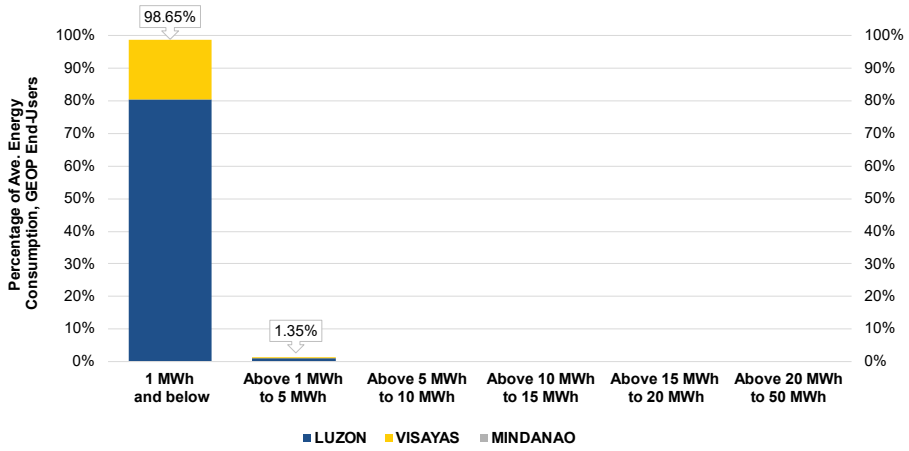


Figure 30. Percentage of Average Energy Consumption of GEOP End-users, 2024-Q4

2.1.1.6. Suppliers

Within the GEOP framework, authorized RESs are allowed to supply energy, contingent with the possession of an operational permit from the Department of Energy (DOE) and proper authorization or licensing from the ERC, which will then allow them to become an RE Supplier.

As of December 2024, there were 18 registered RE Suppliers in the market. Of these, only 10 currently have active contracts with GEOP End-users.

Regarding the SoLRs, 16 suppliers were registered. However, it is important to note that no GEOP End-users are currently under any SoLRs, as all GEOP End-users have active RE Suppliers fulfilling their energy needs.

Table 2. Cumulative Number of Supplier

	Licensed/Authorized	Registered	Serving GEU
RE Supplier	18	18	9
LRES	1	1	1
SoLR	48	16	-

2.2. MARKET SHARE

2.2.1. Supplier Share

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

In terms of the share by major participant grouping of RE Suppliers, based on the number of GEOP End-users registered in the market as of December 2024 billing period, Figure 31 shows that the Ayala Group continues to hold the largest market share, now accounting for 64% of total GEOP end-users. This may raise concerns regarding market dominance in serving GEOP end-users.

The EDC and RE suppliers not affiliated with MPGs followed with 18% and 15% shares, respectively, while small shares from Aboitiz and MERALCO make up the remainder of the market. This trend highlights the continued dominance of the Ayala Group, likely due to its extensive portfolio of renewable energy plants, alongside the persistent presence of other key players in the GEOP landscape.

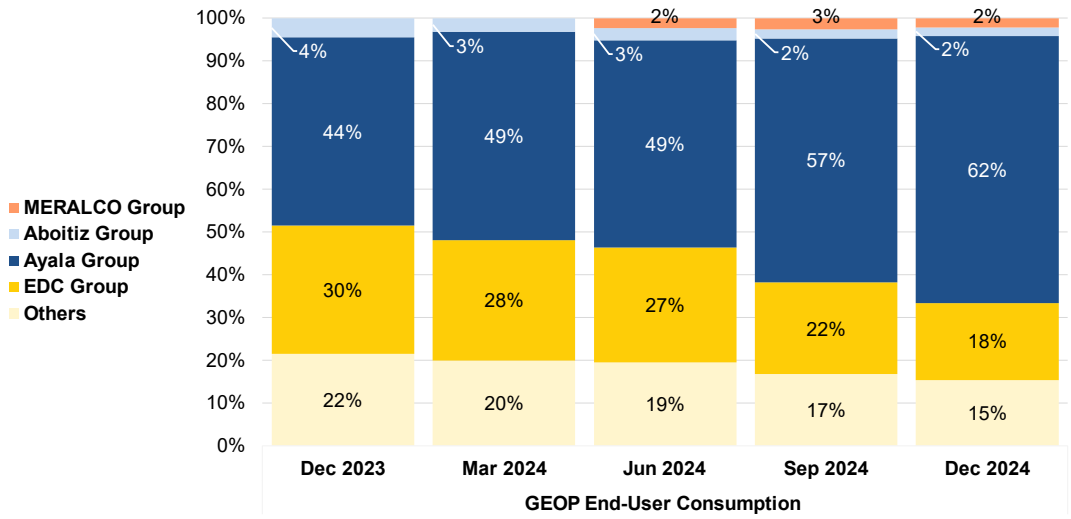


Figure 31. Share in Number of GEOP End-Users Per Major Participant Grouping, 2023-Q4 to 2024-Q4

Figure 32 further proved the sustained control of Ayala Group in the GEOP market, holding a dominant share of 62% in terms of energy consumption as of 4th Quarter of 2024. This further solidifies their position as the top provider, not just in terms of the number of GEOP end-users, but also in the total energy delivered.

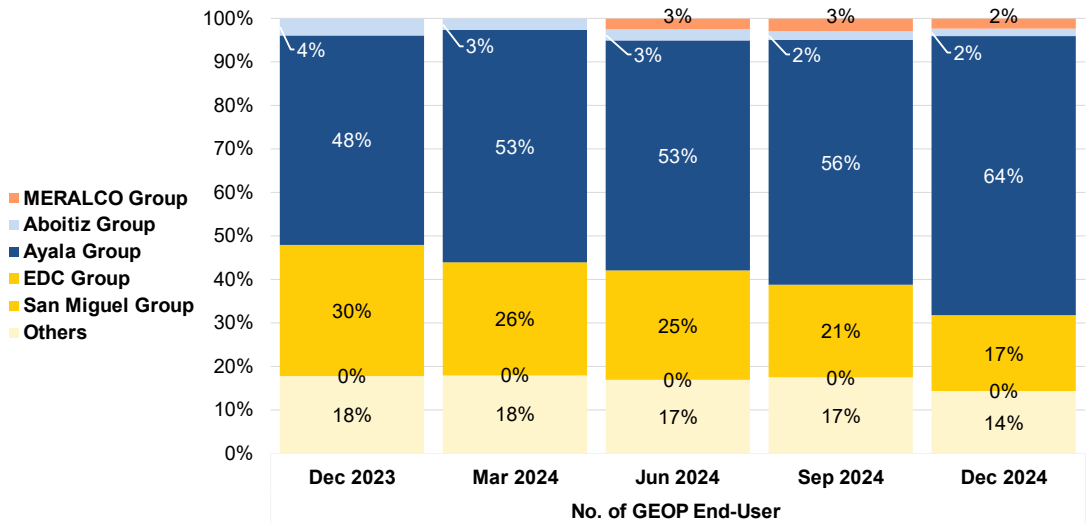


Figure 32. Share in Total Energy Consumption of GEOP End-users Per Major Participant Grouping, 2023-Q4 to 2024-Q4

2.2.1.2. Consumption Per Franchise Area Location

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

About 71% of the registered GEOP End-users' consumption, as shown in Figure 33(a), were located within MERALCO's franchise area, 15% within the VECO franchise, and 14% scattered throughout the other franchise areas and economic zones. Figure 33(b) illustrates that within the MERALCO franchise area, the majority of GEOP End-Users were supplied by the Ayala group, which accounted for 69% of the total consumed energy within the area followed by the EDC group, the second top major participant grouping within the GEOP. The presence of smaller suppliers (12% combined share) suggests that while competition exists, established energy firms still hold the majority of the market.

The significant share of MERALCO's franchise area in the total energy consumed by GEOP End-users, which covers Metro Manila and its neighboring major urban cities, aligns with its reputation as the largest DU in the Philippines. The same is true for the major DU in Visayas, where VECO holds 15% of the total GEOP End-user consumption. With Cebu as the economic hub in the region, businesses in the area are gradually adopting GEOP as source for renewable energy.

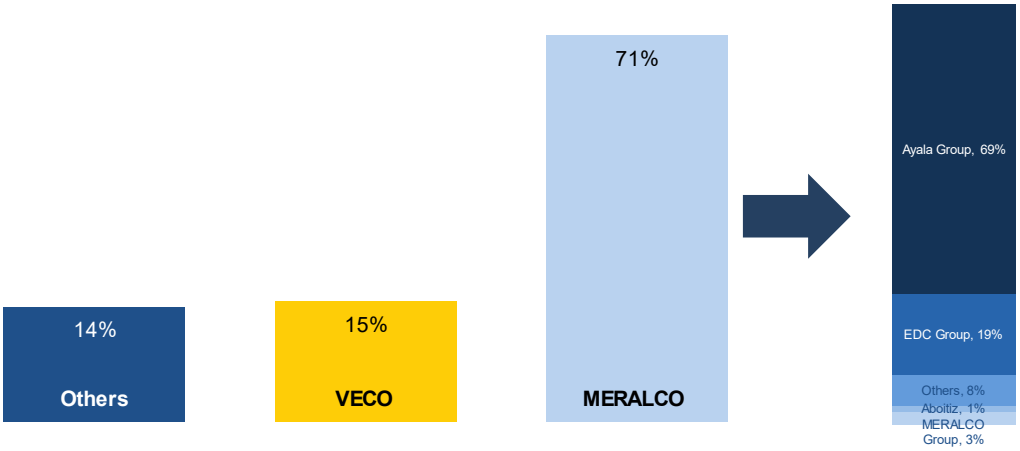


Figure 33. (a) Figure 33. (a)

Figure 33. (a) GEOP End-Users Energy Consumption by Franchise Area, 2024-Q4; (b) GEOP End-Users Energy Consumption by Supplier within MERALCO Franchise Area, 2024-Q4

2.2.2. Market Concentration

2.2.2.1. Herfindahl–Hirschman Index (HHI)

This section discusses the market concentration in the GEOP, by major participant grouping determined by the ERC. The calculation of HHI was based on the number of contracted GEOP End-users and the corresponding energy consumption.

Figure 34 shows the level of market concentration using HHI[20] when measured in terms of the number of served GEOP End-users and their consumption.

As previously mentioned, Ayala Group's share of both GEOP end-users and energy consumption has remained consistently high, leading to its dominant position in the GEOP market due to its strong competitive focus.

Consequently, looking at a per RE Supplier basis, Figure 34 illustrates a highly concentrated market, with ACEN Corporation holding 52% of the total GEOP End-users, further contributing to the resulting overall market concentration.

[20] HHI measures the degree of market concentration. Defined as the sum of the Suppliers' market share, the HHI threshold are as follows:
HHI < 1,500 - not concentrated
Greater than 1,500 up to 2,500 - concentrated
Greater than 2500 - highly concentrated

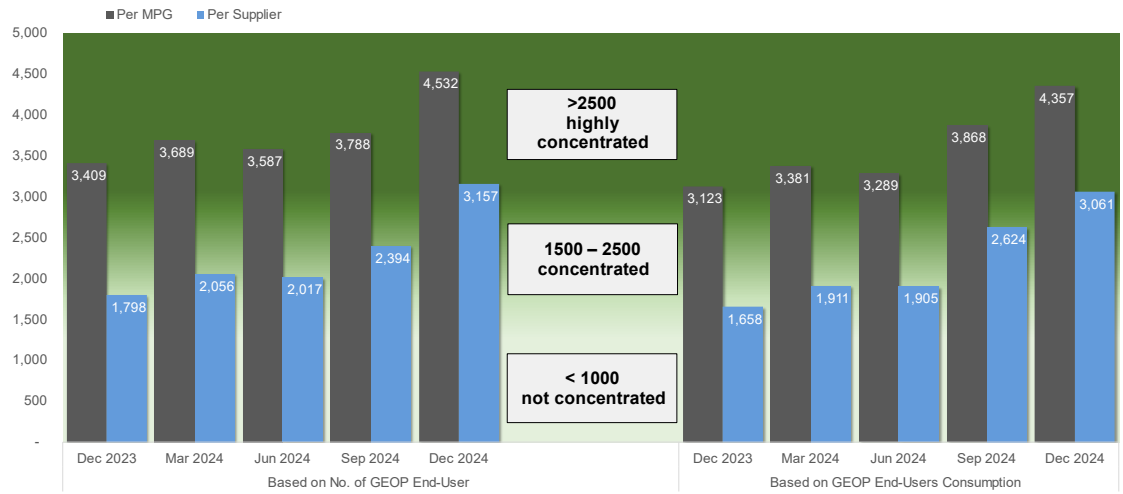


Figure 34. HHI Values, 2023-Q4 to 2024-Q4

2.2.2.2. Four-Firm Concentration Index (C4)[21]

Figure 35 illustrates the level of market concentration in the GEOP market, based on the C4 index, which considers both the number of GEOP end-users served and their energy consumption per major participant group. Throughout the review period, the C4 values remained high for both measures, surpassing the 95% mark.

This analysis aligns with the findings based on market share per RE supplier. The market exhibits characteristics of a monopoly, with the top four suppliers collectively controlling a significant share of 84% of the market, in terms of the number of GEOP end-users, and 82% in terms of total energy delivered. The concentration may be attributed to the program's early implementation stage and the unique characteristics of the energy sources involved in the GEOP.

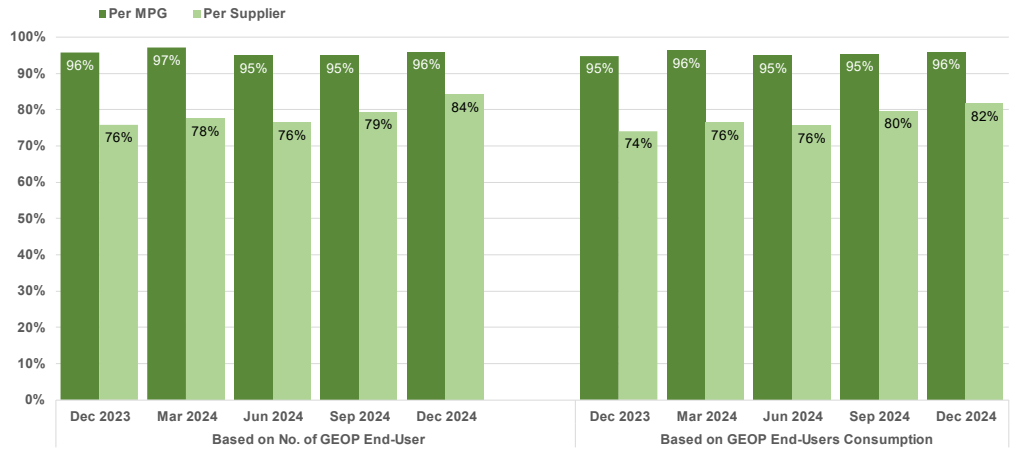


Figure 35. Four-Firm Index, 2023-Q4 to 2024-Q4

[21] C4 measures the percentage of 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%.

2.3. MARKET PERFORMANCE

2.3.1. Energy Consumption

2.3.1.1. Monthly Energy Consumption

Figure 36 depicts the month-on-month consumption of consumers over the past twelve (12) months. As new GEOP End-users continue to participate in the program, continuous and consistent increase in the consumption of both the industrial and commercial sectors, mostly commercial sectors, are observed with a significant rate of increase at the start of September up to November 2024.

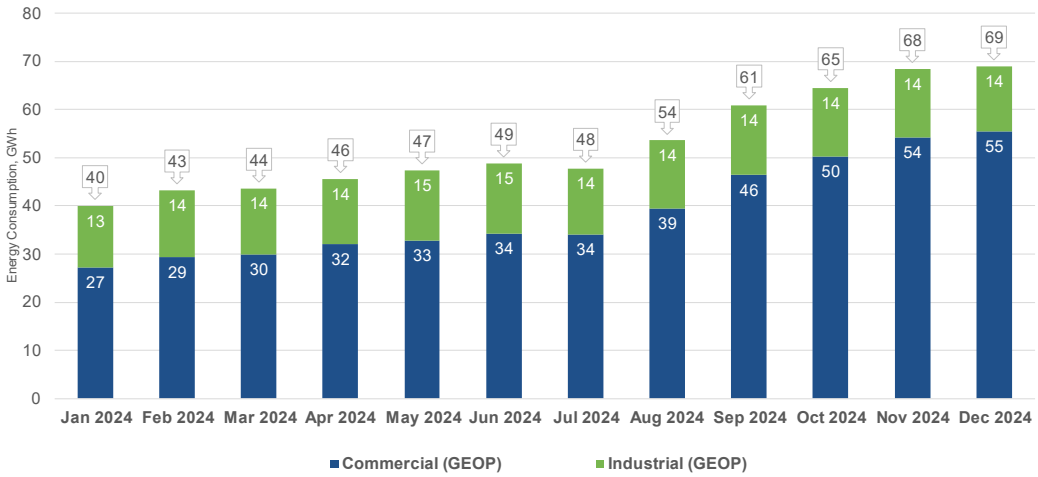


Figure 36. Total Energy Consumption Industry Type (in GWh), January to December 2024

2.3.2. Load Profile

2.3.2.1. Hourly Energy Consumption Profile

Figures 37 and 38 show the hourly average consumption of registered industrial and commercial GEOP End-users, respectively, for the billing periods of July to December 2024. The consumption profile demonstrated how their electricity consumption varied over the course of a 24-hour period.

There was an observed minimal variation in electricity consumption between peak and off-peak periods for industrial participants, as shown in Figure 37, especially from 0600h to 1700h. While a notable dip during the 1200h peak hour suggests that these industrial customers possibly implement break schedules during this time.

Observing the dynamic movement in a month-on-month comparison, October 2024 stands out as the month with the highest average consumption. While the other months had relatively the same consumption by the industrial sector in GEOP.

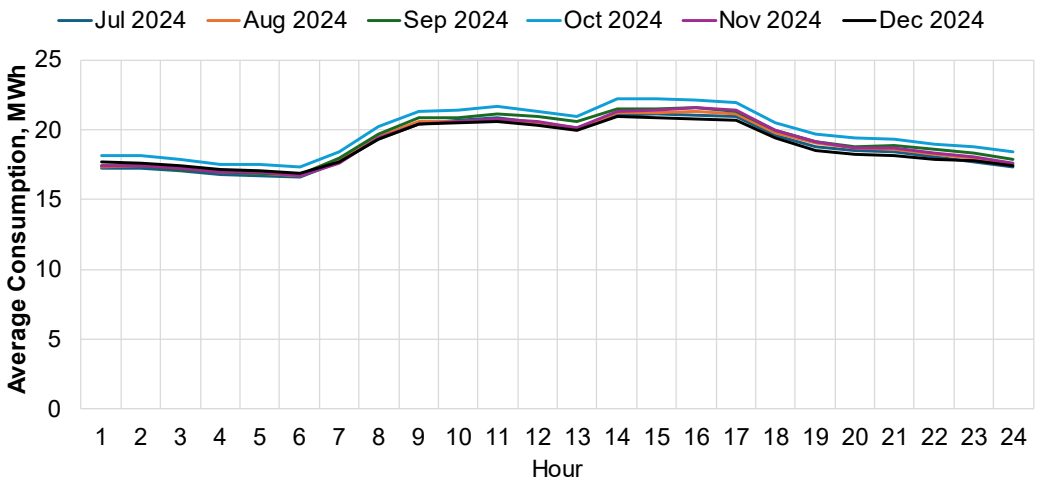


Figure 37. Hourly Average Energy Consumption (in MWh), Industrial, July to December 2024

Figure 38 highlights the difference in consumption patterns between peak and off-peak periods for commercial GEOP End-users. Peak consumption occurs between 0900h to 1800h. Compared to previous months, there was a noticeable rise in the recorded consumption, likely driven by the increasing number of participants in the program.

The trend is further supported by the link between the number of participants and overall consumption patterns. When load profiles are compared, the data suggests a strong link between the total number of registered GEOP End-users and the resulting electricity demand profile of these consumers.

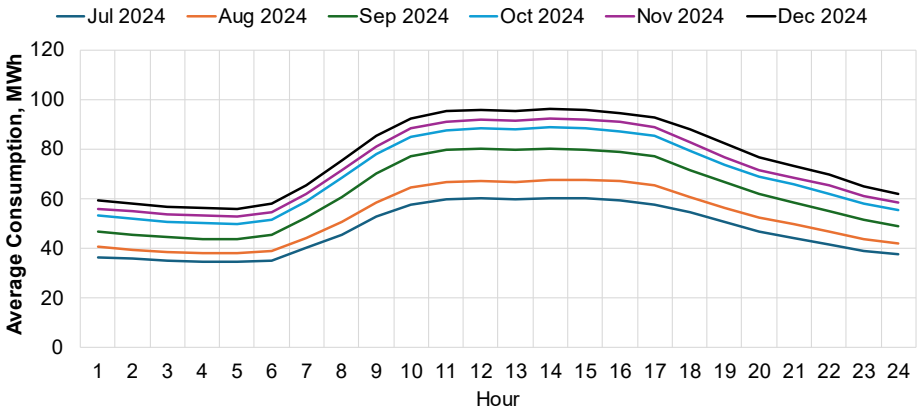


Figure 38. Hourly Average Energy Consumption (in MWh), Commercial, July to December 2024

2.3.2.2. Load Factor

Figure 39 illustrates the monthly load factor[22] of GEOP participants for the 4th quarter of 2024, calculated using actual consumption data (total divided by maximum and total billing hours).

GEOP End-users maintained relatively stable load factors between 71% and 73% throughout the 4th quarter of 2024, with a noticeable drop to 69% in December due to holiday-related slowdowns. This seasonal dip was also observed among RCOA CCs, though industrial CCs typically have more stable consumption due to continuous production. GEOP primarily serves smaller commercial customers below the 500kW threshold, resulting in more fluctuating load factors compared to the steadier profiles of larger commercial and industrial consumers in RCOA. Despite these differences, both GEOP and RCOA participants benefit from effectively managing their load factors to negotiate better rates and reduce demand-related charges.

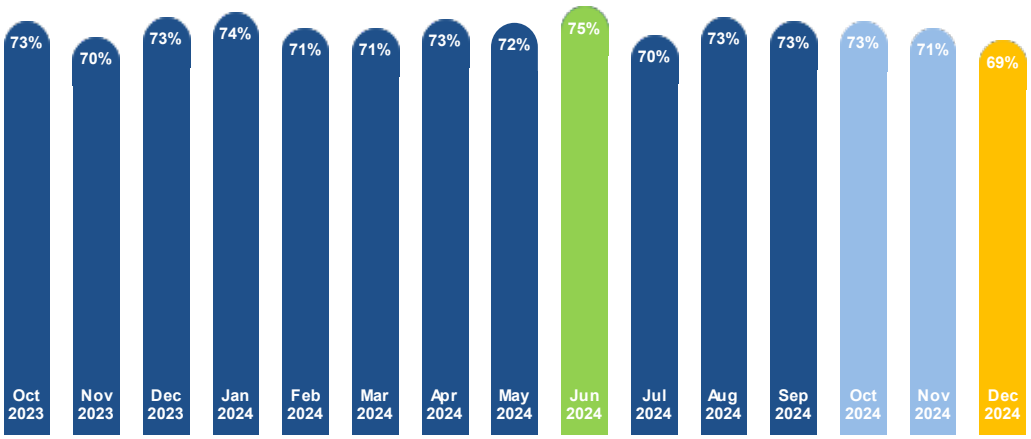


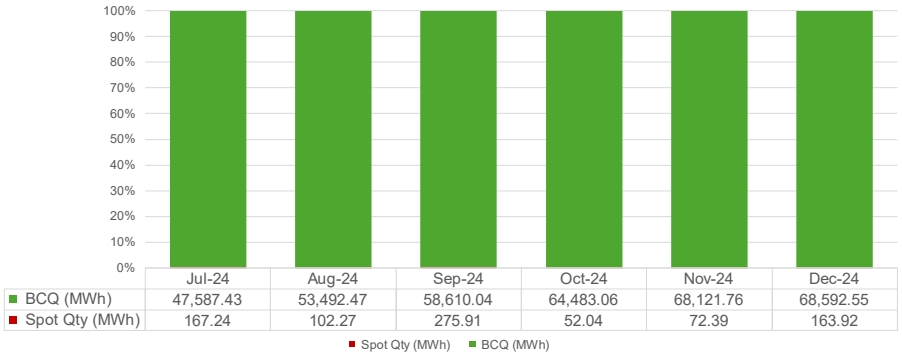
Figure 39. Load Factor, October 2023 to December 2024

2.3.2.3. Market Transactions

This section provides a detailed analysis of the share of energy served within GEOP. As illustrated in Figure 40, a notable portion of the energy served in the program includes purchases from the spot market. This suggests that the energy mix provided to end-users under the GEOP may not be entirely composed of renewable sources.

While GEOP aims to promote renewable energy, the inclusion of spot market purchases means there may still be a reliance on non-renewable sources to meet overall energy demand. This mixed sourcing approach highlights the challenges and complexities of achieving a 100% renewable energy supply within the GEOP framework. Further investigation into the program's design and the factors influencing spot market purchases would be necessary to fully understand the program's contribution to renewable energy adoption.

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



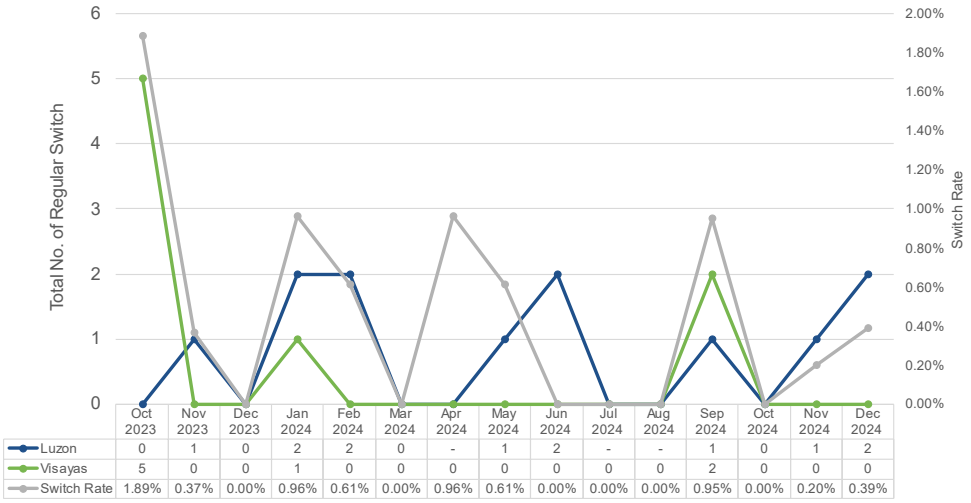
	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24
BCQ (MWh)	47,587.43	53,492.47	58,610.04	64,483.06	68,121.76	68,592.55
Spot Qty (MWh)	167.24	102.27	275.91	52.04	72.39	163.92

Figure 40. GEOP Market Transaction, July to December 2024

2.4. RETAIL ACTIVITY

2.4.1. Customer Switching Rate

Figure 41 shows the switching activity of GEOP participants from October 2023 to December 2024. This reveals three (3) instances of customers switching to a different supplier during the reviewed billing period (October to December 2024).



	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	Apr 2024	May 2024	Jun 2024	Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024
Luzon	0	1	0	2	2	0	-	1	2	-	-	1	0	1	2
Visayas	5	0	0	1	0	0	0	0	0	0	0	2	0	0	0
Switch Rate	1.89%	0.37%	0.00%	0.96%	0.61%	0.00%	0.96%	0.61%	0.00%	0.00%	0.00%	0.95%	0.00%	0.20%	0.39%

Figure 41. Switching Rate, October 2023 to December 2024

2.4.2. New GEOP End-users Entry

Figure 42 illustrates the distribution of GEOP End-users among major participant groups. Most new GEOP End-users—93.9%—have chosen the Ayala Group as their supplier, which may suggest that the group has strong brand trust, competitive pricing, or an aggressive market expansion strategy. In contrast, the EDC Group, MERALCO Group, and other suppliers have captured only a small share of new enrollments. Despite this imbalance, the total number of new GEOP participants increased significantly from July to November 2024, highlighting a growing interest in renewable energy sourcing. The slight drop in December could be attributed to seasonal factors or year-end administrative slowdowns. Overall, dominance of Ayala raises questions about market concentration and suggests that other suppliers may need to enhance their strategies to attract new entrants and create a more balanced

GEOP landscape.

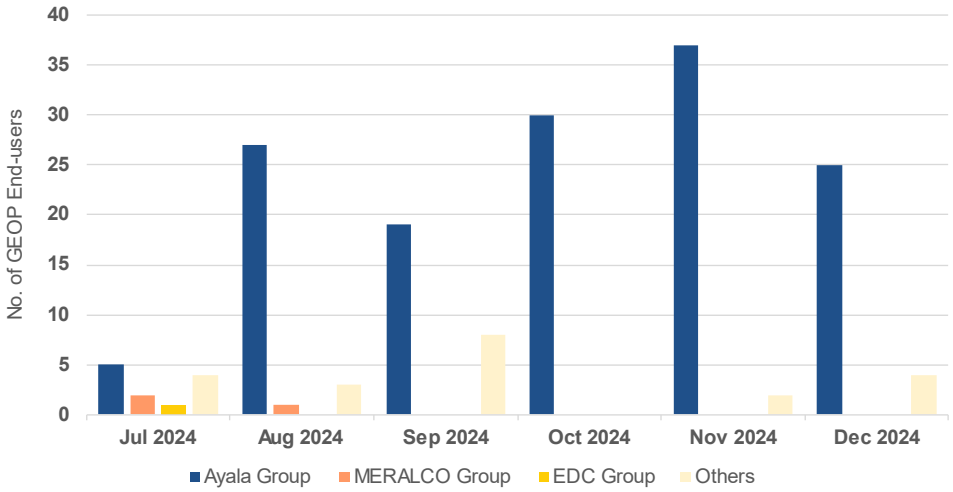


Figure 42. New GEOP End-users Entry, October 2023 to December 2024

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	✓	
	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	Angeles Electric Corporation	✓	✓	32	Leyte II Electric Cooperative, Inc.	✓	
2	Authority of the Freeport Area of Bataan	✓		33	Leyte V Electric Cooperative, Inc.	✓	
3	Aklan Electric Cooperative, Inc.	✓		34	LIMA Enerzone Corporation	✓	
4	Albay Electric Cooperative, Inc.	✓	✓	35	La Union Electric Company, Inc.	✓	
5	Antique Electric Cooperative, Inc.	✓		36	La Union Electric Cooperative, Inc.	✓	
6	Batangas I Electric Cooperative, Inc.	✓	✓	37	Mactan Electric Company	✓	
7	Batangas II Electric Cooperative	✓	✓	38	Mactan Enerzone Corporation	✓	✓
8	Benguet Electric Cooperative	✓	✓	39	Malvar Enerzone Corporation	✓	
9	Balamban Enerzone Corporation	✓		40	Manila Electric Company	✓	✓
10	Bohol Light Company, Inc.	✓		41	MORE Electric and Power Corporation	✓	✓
11	Bohol I Electric Cooperative, Inc.	✓	✓	42	Nueva Ecija I Electric Cooperative, Inc.	✓	
12	Bohol II Electric Cooperative, Inc	✓		43	Nueva Ecija II Electric Area 1 Cooperative, Inc.	✓	
13	Cagayan I Electric Cooperative, Inc.	✓		44	Negros Occidental Electric Cooperative	✓	✓
14	Cagayan II Electric Cooperative, Inc.	✓		45	Northern Negros Electric Cooperative, Inc.	✓	
15	Capiz Electric Cooperative, Inc.	✓	✓	46	Negros Oriental II Electric Cooperative, Inc.	✓	
16	Camarines Sur II Electric Cooperative, Inc.	✓		47	Olongapo Electricity Distribution Company	✓	
17	Cebu I Electric Cooperative, Inc.	✓	✓	48	Pangasinan III Electric Cooperative, Inc.	✓	✓
18	Cebu II Electric Cooperative, Inc.	✓	✓	49	Pampanga I Electric Cooperative, Inc.	✓	
19	Cebu III Electric Cooperative, Inc.	✓	✓	50	Pampanga II Electric Cooperative, Inc.	✓	✓
20	Clark Electric Distribution Corporation	✓		51	Peninsula Electric Cooperative, Inc.	✓	
21	Cabanatuan Electric Corporation	✓		52	Quezon I Electric Cooperative, Inc.	✓	
22	Central Negros Electric Cooperative, Inc.	✓	✓	53	Samar I Electric Cooperative, Inc.	✓	✓
23	Central Pangasinan Electric Cooperative, Inc.	✓		54	San Fernando Electric Light and Power Company, Inc.	✓	
24	Dagupan Electric Corporation	✓	✓	55	Sorsogon II Electric Cooperative, Inc.	✓	
25	Don Orestes Electric Cooperative, Inc.	✓		56	Subic EnerZone Corporation	✓	
26	Iloilo I Electric Cooperative, Inc.	✓	✓	57	Tarlac I Electric Cooperative, Inc.	✓	✓
27	Iloilo II Electric Cooperative, Inc.	✓		58	Tarlac II Electric Cooperative, Inc.	✓	✓
28	Iloilo III Electric Cooperative, Inc.		✓	59	Tarlac Electric, Inc.	✓	✓
29	Ilocos Norte Electric Cooperative, Inc.	✓		60	Visayan Electric Company, Inc.	✓	✓
30	Isabela I Electric Cooperative, Inc.	✓		61	National Grid Corporation of the Philippines[23]	✓	
31	Isabela II Electric Cooperative, Inc.	✓					

[23] For Directly Connected Customers