



MEETING MINUTES

Subject/Purpose : 247th RCC (Regular) Meeting
 Date & Time : 20 June 2025, 9:00 AM to 3:00 PM
 Venue : PEM Board Room/Online via Microsoft Teams
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ATTENDEES

	Name	Designation/Position	Department/Company
1.	Rachel Angela P. Anosan	Chairman, Independent	RCC
2.	Jesusito G. Morallos	Member, Independent	RCC
3.	Jordan Rel C. Orillaza	Member, Independent	RCC
4.	Emmanuel Genesis T. Andal	Member, Independent	RCC
5.	Dixie Anthony R. Banzon	Member (Principal), Generation Sector	RCC
6.	Jayson A. Francisco	Member (Principal), Generation Sector	RCC
7.	Carlito C. Claudio	Member (Principal), Generation Sector	RCC
8.	Ryan S. Morales	Member (Principal), Distribution Sector	RCC
9.	Russel S. Alabado	Member (Principal), Distribution Sector	RCC
10.	Virgilio C. Fortich Jr.	Member (Principal), Distribution Sector	RCC
11.	Nelson M. Dela Cruz	Member (Principal), Distribution Sector	RCC
12.	Darryl Lon A. Ortiz	Member (Principal), Transmission Sector	RCC
13.	Gian Karla C. Gutierrez	Member (Principal), Supply Sector	RCC
14.	Bryan Alvin A. Calasanz	Member (Alternate), Supply Sector	RCC
15.	Kristoffer Monico S. Ng	Member (Alternate), Market Operator	RCC
16.	Jhannelyn D. Marasigan	DOE Observer	DOE
17.	John Paulo O. Castro	DOE Observer	DOE
18.	Chrismah Joy D. Quinones	DOE Observer	DOE
19.	Jane May M. Mea	DOE Observer	DOE
20.	Karen A. Varquez	Secretariat	PEMC
21.	John Eisendel M. Labay	Secretariat	PEMC
22.	Mary Rose L. Bisnar	Secretariat	PEMC
23.	Bienvenido C. Mendoza Jr.	Chief Market Assessment Officer	PEMC
24.	Aldjon Kenneth M. Yap	Market Assessment Group (MAG)	PEMC
25.	Ira Lee P. Corectico	MAG	PEMC
26.	Kevin John Y. Dela Cuesta	MAG	PEMC
27.	Marlo S. Delizo	MAG	PEMC
28.	Armie Eloisa V. Exporna	MAG	PEMC
29.	Aldrin W. Reyes	MAG	PEMC
30.	Leo John A. Juguilon	MAG	PEMC
31.	Mark Froilan L. Lingao	MAG	PEMC



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	Name	Designation/Position	Department/Company
32.	Jake Jerald M. Gines	MAG	PEMC
33.	Andrea J. Mendiola	Chief Legal Officer	PEMC
34.	Gabriel R. Marmeto	Legal	PEMC
35.	Earl James G. Reyes	Legal	PEMC
36.	Joshua Joy F. Co	Legal	PEMC
37.	Hilary Romeli C. Florendo	Enforcement and Compliance Office (ECO)	PEMC
38.	Nylle Gregory P. Bague	ECO	PEMC
39.	Jeffrey B. Torejo	ECO	PEMC
40.	Nofernex B. Raymundo	ECO	PEMC
41.	Cedric Xian Mico L. Uy	Office of the President - WESM Governance Office	PEMC
42.	Justin Ranier S. Chan	Proponent - Market Surveillance Committee (MSC)	MSC
43.	Ermelindo R. Bugaoisan, Jr.	Proponent - National Grid Corporation of the Philippines (NGCP)	NGCP
44.	Joselito C. Quilala	Proponent	NGCP
45.	June C. Pascual	Proponent	NGCP
46.	Mario R. Pangilinan	Commenter – Technical Committee (TC)	TC
47.	Joebet Isaac V. Del Rosario	Commenter – Manila Electric Company (MERALCO)	MERALCO
48.	Charm Ortaliz	Commenter – Central Power Negros Reliability, Inc., (CENPRI)	CENPRI
49.	Joemar Delos Santos	Commenter	CENPRI
50.	Rhea Subade	Commenter	CENPRI
51.	Johanna Erika Bustillo	Commenter	CENPRI
52.	Mila Arana	Commenter	CENPRI
53.	Zyndyryn Pastera	Commenter	CENPRI
54.	Lyka Labrador	Commenter – SPC Power Corporation/SPC Island Power Corporation (SPC/SIPC)	SPC/SIPC
55.	Marlene Joy Saba	Commenter	SPC/SIPC
56.	Jereme Ann Peñafiel	Commenter	SPC/SIPC
57.	Richard Arcenal	Commenter	SPC/SIPC
58.	Angela Marie Basa	Commenter	SPC/SIPC
59.	Antonio Mercado	Commenter – Millenium Energy Inc., /Panasia Energy Inc., (MEI/PEI)	MEI/PEI
60.	Glynn Gayman	Commenter – Aboitiz Power Corporation (APC)	APC



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1.0 Call to Order

The meeting was called to order at 9:02 AM.

2.0 Determination of Quorum

The quorum was determined with nine (9) principal members on-site, and three (3) principal members and two (2) alternate members online. Four (4) DOE observers were also online.

3.0 Adoption of Agenda

The RCC adopted the proposed agenda, as presented by Ms. Mary Rose L. Bisnar (Secretariat).

4.0 Draft Minutes of Previous Meetings

Ms. Bisnar presented the draft minutes of the 246th RCC (Regular) Meeting held on 16 May 2025, highlighting that there were no comments received to the draft emailed on 29 May 2025.

Agreement/s:

- ✓ The RCC approved the minutes, as presented.
- ✓ The Secretariat shall route the minutes via Adobe Sign, for RCC's signature.

5.0 Matters Arising from Previous Meeting

5.1 Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancies in Dispatch Instruction Report

- Presenter/s: Ms. Mary Rose L. Bisnar (Secretariat)
Mr. Ermelindo R. Bugaios, Jr. (Proponent – NGCP)
- Action Requested: For discussion and approval
- Material/s: Annex A – Presentation Material of 247th RCC (Regular) Meeting
Annex B – Matrix of the Proposed Amendment

Proceedings:

Ms. Bisnar reported that the commenting period for the proposed amendment¹ concluded on 11 April 2025. On 19 May 2025, the proponent, National Grid Corporation of the Philippines (NGCP), provided its responses to the comments received from the following stakeholders:

1. Aboitiz Power Corporation (APC)
2. Central Negros Power Reliability Inc. (CENPRI)
3. Department of Energy (DOE)

¹ [ORCP-WM-25-01 \(Discussion Paper and Matrix\)](#)



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- 37 4. Independent Electricity Market Operator of the Philippines (IEMOP)
- 38 5. Millenium Energy Inc., and Panasia Energy Inc., (MEI/PEI)
- 39 6. Manila Electric Company (MERALCO)
- 40 7. Market Surveillance Committee (MSC)
- 41 8. Philippine Electricity Market Corporation (PEMC)
- 42 9. SPC Power Corporation/SPC Island Power Corporation (SPC/SIPC)
- 43 10. Technical Committee (TC)
- 44

Discussion on the General Comments:

- 45
- 46
- 47 • ***Necessity of a Second Dispatch Instruction Report (DIR) Validation Process***
- 48

49 On the general comment requesting the proponent to explain the necessity of another
 50 validation process, NGCP provided the following reasons:

- 51
- 52 a. Incorrect application of tags by generators, specifically regarding Merit Order Table
 53 (MOT Raise), Must-Run Unit (MRU), Ancillary Services (AS), Market
 54 Intervention/Suspension (MI/MS) classifications; e.g. The generator submitted a claim
 55 for MOT Raise despite being knowingly scheduled and instructed by the System
 56 Operator (SO) to operate as an Ancillary Service – Dispatchable Reserve (AS-DR);
- 57 b. Inconsistencies in the reported megawatt (MW) values and corresponding durations;
 58 e.g. the Trading Participant (TP) reported 60 MW while the SO, 50 MW;
- 59 c. DIR Discrepancy Claims are submitted without the necessary supporting documents.
 60 Generators only utilize a prescribed Excel template provided by the Market Operator
 61 (MO).
- 62

63 Mr. Ryan S. Morales (RCC-Distribution) suggested that item (c) could potentially be a
 64 reason requiring revalidation. However, concerning items (a) and (b), he asked the SO how
 65 these reasons would necessitate revalidation.

66

67 Mr. Ermelindo G. Bugaoisan Jr. (Proponent – NGCP) explained that TPs want to be tagged
 68 in dispatch instructions that provide opportunities to claim additional compensation. For
 69 example, if the instruction is to provide Ancillary Services, and their operations cannot
 70 compete with market prices, TPs will request a Must Run Unit (MRU) status.

71

72 He cited examples where, based on initial instructions recorded in the DIR, a subsequent
 73 discussion with the Plant Operator occurred, but the instruction in the DIR was not updated.
 74 Items (a) and (b) are examples of these scenarios, provided upon request for specific
 75 reasons. If these instances were to be revalidated in the DIR, it would reveal that only the
 76 initial instructions were recorded there. Validating based solely on these initial instructions
 77 might be problematic if the TP does not accept the validation and instead insists on



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78 providing different supporting documents and recordings to further revalidate the reason
79 that could lead to item (c).
80

81 For item (b), Mr. Bugaoisan noted situations where, for instance, an instruction to "raise to
82 20MW" had a different understanding regarding the recorded time. However, this is typically
83 resolved later during the validation process. Even if the TPs are not amenable to the
84 validation, the SO still attempts to resolve the matter.
85

86 He continued to explain that this proposed amendment aims to provide more opportunities
87 for TPs. In the case of Malaya Thermal Power Plant, where discrepancies were unresolved
88 during validation and led to dispute resolution, serves as a prime example. This proposed
89 amendment was submitted to prevent the recurrence of such disputes and to give the
90 System Operator (SO), Market Operator (MO), and Trading Participants (TP) better
91 chances to thoroughly revalidate whether an additional claim is valid.
92

93 Mr. Morales commented that a single-pass review seems insufficient due to additional
94 documents needing submission. Ms. Rachel Angela P. Anosan (RCC-Independent) inquired
95 whether the SO would be able to check discrepancies on their reports during the first
96 validation process.
97

98 Mr. Bugaoisan confirmed that most claims were validated and resolved in the initial
99 validation, but there were instances where a claim was not resolved in a single validation
100 round.
101

102 Mr. Jesusito G. Morillos (RCC-Independent) stated that there should be no need for
103 revalidation in an ideal scenario. However, he explained that, for example, if he were the
104 involved entity and mistakes were overlooked during the initial validation, he might be
105 inclined to submit the matter to arbitration. He added that revalidation is a crucial phase to
106 help avoid the lengthy arbitration process. Given this, he suggested imposing a penalty to
107 discourage TPs from frequently requesting revalidation. This would incentivize them to exert
108 greater effort in providing all necessary documents and resolving claims during the initial
109 validation process.
110

111 Given the reasons provided for needing another revalidation process, Mr. Kristoffer Monico
112 S. Ng (RCC-Market Operator) asked whether those reasons could instead be addressed by
113 lengthening the timeline for reconciliation between the SO and TPs, rather than introducing
114 an additional revalidation process. He believed that giving more time for the SO and TPs to
115 reconcile their differences would address the issues. He noted that the proposed
116 revalidation process would require more working days, which could make the timeline too
117 tight for the MO.
118



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119 Mr. Bugaoisan explained that the process is different because data reconciliation between
 120 the SO and the MO originates from the market. TPs cannot directly approach the SO as part
 121 of this process. Instead, TPs must raise issues through the MO, who then submits the
 122 discrepancy claims to the SO for validation. He clarified that the initial validation is primarily
 123 between the MO and the TPs, as it directly impacts settlement. For the MO to provide clear
 124 responses, they must first validate the discrepancy claims with the SO. Once the SO
 125 responded, the MO then publishes the validated claims. This constitutes the first validation
 126 process. However, some TPs are not receptive to the data published by the MO and
 127 request revalidation often beyond the established timeline.

128
 129 Mr. Carlito C. Claudio (RCC-Generation) emphasized the need for a revalidation process
 130 because there have been instances where the SO overlooked or did not consider crucial
 131 details during the initial validation.

132
 133 From a compliance standpoint, Mr. Jayson A. Francisco (RCC-Generation) stated that the
 134 DIR serves as specific evidence to substantiate SO instructions. He noted that there have
 135 been several occasions where circumstances experienced by a Generation Company were
 136 not reflected in the DIR, requiring further submission to the Enforcement and Compliance
 137 Office (ECO). Mr. Francisco believes that addressing these issues through a revalidation
 138 process would lead to smoother compliance procedures because the DIR would become
 139 more complete. He also added that, based on the cases Mr. Bugaoisan discussed, the SO
 140 has a valid basis to warrant the requested revalidation.

- 141
142 • **Clarification on Dispatch Protocol Manual Sections 14.4.9 and 17.5.3**

143
 144 Mr. Ng stated that the MO has noted an inconsistency between the two sections. He
 145 explained that, based on historical data, the MO has never failed to act on submitted
 146 discrepancies within the prescribed timeline. However, he clarified that if the SO fails to
 147 submit their validated report within the prescribed timeline for Must Run Unit (MRU) cases,
 148 the MO will not follow Section 14.4.9. This is because Section 17.5.3 specifically addresses
 149 MRU instances, whereas Section 14.4.9 pertains to a more general provision. Therefore, in
 150 MRU cases, the MO will adhere to Section 17.5.3.

- 151
152 • **Impact of the Extended DIR on Processing Additional Compensation**

153
 154 If the proposed amendment is approved, Mr. Ng stated that the MO does not foresee any
 155 impact on the process of additional compensation, particularly regarding the settlement
 156 timeline. The MO notes that for cases of Secondary Price Cap (SPC), Administered Price
 157 (AP), or Price Substitution Methodology (PSM), the relevant Generation Companies
 158 (GenCos) are required to submit their notice of claims within 14 working days of their final
 159 settlement issuance. However, the MO is concerned that if SPC, AP, and PSM events occur
 160 at or near the end of the billing period, and an additional revalidation process is also in



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161 place, GenCos might struggle to meet the 14-working-day deadline for submitting these
 162 claims.

163
 164 Mr. Jordan Rel C. Orillaza (RCC-Independent) expressed that a difficulty with this proposed
 165 amendment is that it attempts to create a broad rule change for specific issues, when the
 166 wider concern it aims to cover might not even exist. He supported the comments of the
 167 Philippine Electricity Market Corporation (PEMC) regarding the characteristics of
 168 revalidations, suggesting that if these specific characteristics are identified, solutions should
 169 be tailored only for those defined cases. He also highlighted the response of NGCP about
 170 the frequency of these revalidations, questioning if a full revalidation process is truly needed
 171 given their infrequent occurrence, and suggesting that such cases could be handled through
 172 dispute resolution instead.

173
 174 Mr. Morillos sought clarification on the types of disputes filed that are related to the DIR. He
 175 shared that from his experience as former Dispute Resolution Administrator (DRA), disputes
 176 filed with the DRA were typically on the policy level, whereas the current subject matter
 177 concerns administrative or operational discrepancies. He suggested that these types of
 178 operational discrepancies should not be escalated to the DRA, deeming it an unideal
 179 escalation path.

180
 181 Mr. Darryl Lon A. Ortiz (RCC-System Operator) explained that this proposal emanated from
 182 a recently concluded dispute resolution regarding an MRU claim. A TP had submitted a
 183 claim concerning discrepancies in the DIR. While the SO had provided the validated claim,
 184 the MO had a different understanding at that time. Consequently, the SO filed this rule
 185 change proposal to prevent such instances from recurring.

- 186
- 187 • ***Provision of the Revalidated DIR to the Enforcement and Compliance Office (ECO)***
- 188

189 Mr. Ng confirmed that the MO will submit the revalidated data to the ECO if the proposal is
 190 approved.

- 191
- 192 • ***Further to NGCP's Response to SPC/SPIC's Comments***
- 193

194 Mr. Bugaoisan reiterated that the proposed amendment aims to minimize disputes. At the
 195 same time, it could genuinely help TPs receive additional compensation, while ensuring the
 196 SO remains consistent and validates legitimate reasons with supporting documentation.

- 197
- 198 • ***'Working Days' vs 'Calendar Days'***
- 199

200 Mr. Ortiz asked for clarification on the proper term to use: "business days" or "calendar
 201 days." Ms. Anosan explained that, as defined in the WESM Rules, "business days" refer to



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202 the market's 24/7 operation which is similar to "calendar days", while "working days" are
 203 defined as days of the week excluding holidays and weekends. She noted, however, that
 204 the WESM timelines typically refer to business days.

205
 206 Mr. Francisco concurred that WESM timelines are based on "business days." Referring to
 207 the previous discussion about a potentially tight timeline if the proposed revalidation process
 208 is approved, he highlighted that TPs often face confusion when the MO's notices refer to
 209 "working days," requiring them to seek clarification.

210
 211 Ms. Anosan further clarified that "business days" align with calendar days, whereas
 212 "working days" are equivalent to banking days. She added that if the proposed amendment
 213 uses "working days," it might impact the billing and settlement timetable. Therefore, she
 214 commented that using "business days" might be more appropriate.

215
 216 Mr. Bugaoisan stated that the SO would prefer to use "working days." He explained that the
 217 SO's dispatchers, who provide inputs to the DIR work on shifting schedules. When a
 218 validation request is received, the responsible dispatchers are the ones who should assess
 219 it, as they have direct knowledge of the dispatch instruction. He noted that these
 220 dispatchers are typically available to validate during normal office working hours when they
 221 are on staff-duty.

222
 223 In line with Mr. Bugaoisan's explanation and further to her previous comment, Ms. Anosan
 224 expressed that the use of "business days" should be carefully considered. She reiterated
 225 that if "working day" is used, it will not align with the billing and settlement timetable and will
 226 prolong the revalidation process.

227
 228 Referring to the statistics, Mr. Bugaoisan responded that the SO has been trying to expedite
 229 the validation process. However, he acknowledged that exceptional cases requiring
 230 revalidation, which are likely fewer, do exist. He added that the SO plans to discuss this
 231 process with the TPs to improve it and avoid the recurrence of revalidation requests.

232 **Line-by-Line Deliberations:**

- 233 • ***Roles and Responsibilities of the SO and the MO in Revalidation Process***

234
 235
 236 Further to the Technical Committee's (TC) comments on Section 14.4.9, Mr. Mario R.
 237 Pangilinan (Technical Committee) sought clarification on the SO's involvement in the
 238 revalidation process. He stated that the TC believes the MO should be the sole party
 239 involved in revalidation. If disputes arise that impact settlement, the SO should not bear the
 240 burden of revalidating discrepancies; instead, their involvement should be requested only on
 241 a case-by-case basis. He added that he assumes the DIR should already be final, and the
 242 SO's role is to reflect real-time actions versus what was scheduled, where discrepancies
 243



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244 would then become apparent. However, it is not the SO's responsibility to explain these
 245 discrepancies or to exert effort towards reconciliation. He suggested there might be
 246 overlapping functions. He also agreed with Mr. Orillaza that this is solely the MO's
 247 responsibility. Given the numerous complaints or disputes, he concluded that there might be
 248 a need to revisit the MO's systems and procedures.

249
 250 Ms. Anosan explained that the proposed amendment specifically refers to the DIR, which is
 251 used for settlement and claiming additional compensation. While there is merit in assuming
 252 the report is final, the original rule provides TPs an opportunity to validate or dispute the
 253 SO's report. The SO, through this proposed amendment, seeks to introduce an additional
 254 validation process.

255
 256 Mr. Claudio noted that the core issue lies in the consistency of data provided in the DIR. He
 257 stated that the validation process is not error-proof, and discrepancies are sometimes
 258 overlooked during the initial validation. He therefore believes there is a need for a
 259 revalidation process to address these overlooked discrepancies, otherwise, TPs might be
 260 unable to file such claims. Mr. Francisco concurred with this view.

261
 262 Mr. Morillos also agreed with Mr. Claudio. He stated that an ideal system is error-free. He
 263 then referenced two principles in risk management:

- 264 1. ***The Problem of Many Hands Principle***: This refers to situations where many
 265 entities are involved in a process, making it difficult to pinpoint individual
 266 responsibility.
- 267 2. ***The Phenomenon of Unintended Consequences***: This states that any purposeful
 268 action can have outcomes not part of the actor's original intention.

269 Relating this to the validation process, he highlighted that the process involves many
 270 entities—such as the SO, MO, and TPs—and it cannot be guaranteed that no data will be
 271 overlooked during validation. The proposed amendment seeks to add another revalidation
 272 process for discrepancies missed during the initial validation. To prevent abuse of this
 273 revalidation process, he reiterated his suggestion to impose a penalty on requests for
 274 revalidation.

- 275
 276 • ***Criteria for the MO's Review of Submitted Revalidation Requests and their
 277 Corresponding Review Timeline.***

278
 279 Mr. Orillaza opined that an additional layer of revalidation might not be the solution to
 280 overlooked discrepancies. He suggested that one solution could be greater information
 281 visibility, ensuring all responsible entities have a common set of information. Ms. Anosan
 282 clarified that the DIR is already published on the MO's website.

283
 284 Mr. Bugaoisan agreed with Mr. Orillaza about identifying specific criteria for revalidation and
 285 with Mr. Morillos about imposing penalties. He cited an instance where the SO received



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286 30,000 records for revalidation from a TP for what should have been an MRU claim. He
287 stressed that this process requires strict implementation. He added that the MO should be
288 responsible for filtering requests to ensure only valid ones proceed to revalidation. Such
289 high volume of records would demand significant time from the SO for revalidation. He
290 suggested these criteria could be further discussed with the MO.

291
292 Mr. Ng also agreed that there should be criteria for which requests are allowed for
293 revalidation. However, while the MO is open to discussion, he stated that the SO should be
294 the one to identify these criteria and determine which requests are acted upon, as the DIR
295 originates from them, and they are responsible for validating claims.

296
297 Regarding the rationale for providing a 3-day period for TPs to report any discrepancies
298 found in the DIR, Mr. Ng clarified that this 3-day period was the SO's proposed timeline. He
299 explained that since the proposed amendment specifically refers to a revalidation process,
300 its scope is now narrower compared to the initial validation process. He also added that the
301 MO supports the revalidation process having as short period as possible.

302
303 • ***Issuance of Preliminary and Final Settlement***

304
305 Mr. Morales asked whether this proposed amendment would affect any financial statements
306 or invoices. If so, he suggested making the process analogous to the MO settlement
307 process. Should the proposed amendment be approved, Ms. Anosan responded that the
308 entire validation process should ideally be completed before the issuance of the preliminary
309 statement, with no adjustments needed in the final statement.

310
311 Mr. Joemar Delos Santos (CENPRI) raised an issue regarding the settlement of their
312 compensation. He stated that CENPRI found a discrepancy between the settlement issued
313 by the MO and CENPRI's own computation, which was attributed to Market Intervention. He
314 explained that the MO informed them that the SO did not submit the revised Ancillary
315 Services Procurement Agreement (ASPA) nomination schedule to the MO, leading to a
316 deduction for incidental energy. However, this deduction was not paid by the SO due to the
317 Market Intervention, implying that all ASPA was effectively cancelled. CENPRI also
318 communicated with the SO, who responded that they had submitted the revised nomination
319 schedule. In this scenario, Mr. Delos Santos highlighted that CENPRI was unaware of these
320 data exchanges between the SO and the MO, which was the core of CENPRI's concern
321 regarding the settlement discrepancy.

322
323 Ms. Anosan reiterated that the proposed amendment aims to provide TPs an opportunity to
324 revalidate reported discrepancies in the DIR. She emphasized that this report is considered
325 final by the SO and published by the MO on their website. If TPs do not request validation of
326 discrepancy claims, the DIR will be deemed final and used for settlement. Mr. Bugaoisan
327 commented that CENPRI might have overlooked the discrepancy.



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328
329 Mr. Delos Santos, however, countered that CENPRI did not overlook the discrepancy in the
330 DIR and confirmed that there were no disputes against the DIR itself. CENPRI was called to
331 run during the Market Intervention, and his key point was that incidental energy was
332 deducted from CENPRI's settlement. Mr. Ng, while not having specific knowledge of
333 CENPRI's concern, stated that he would have the relevant unit from the MO investigate the
334 matter.
335

336 • ***Integration of the Validation and Revalidation Process in the Central Registration and***
337 ***Settlement System (CRSS)***
338

339 On the comment suggesting that the DIR validation be integrated in the CRSS, Mr. Ng
340 responded that the suggestion would require a significant enhancement to the CRSS. He
341 pointed out that this is not a proper subject for a rules change proposal because it refers to
342 the implementation of the rules, rather than the rules themselves. He also added that it is
343 not appropriate to specifically identify the CRSS in the proposed amendment as the means
344 to the process of revalidation requests.
345

346 • ***Common Help Desk***
347

348 Mr. Ng stated that all validation requests are currently routed through one of the MO's
349 divisions, which serves as a common help desk. If the proposed amendment is approved,
350 the same division will continue to function as the common help desk, unless alternative
351 suggestions are proposed.
352

353 For the RCC's information, Ms. Bisnar presented the timeline of activities, outlining target
354 deadlines and their corresponding activities. The RCC noted and concurred with the goal of
355 meeting these target deadlines.
356

357 Agreement/s:
358

- 359 • As input to the deliberation next meeting, the RCC requested the SO and the MO
360 collaborate on the following:
361 1. Establishing criteria for revalidation requests.
362 2. Defining timelines, specifically for the MO's submission of revalidation requests to
363 the SO.
364 3. Exploring the possibility of integrating a second validation phase within the existing
365 validation process, and the potential for extended timelines.
366
367
368



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6.0 New Business

6.1 Proposed General Amendments to the WESM Rulesa and Various WESM Manuals on the Market Surveillance Committee Processes

- **Presenter/s:** Mr. Justin Ranier S. Chan (Market Surveillance Committee – MSC)
- **Action Requested:** For approval for publication to the PEMC Website to solicit comments
- **Material/s:** Annex A – Presentation Material of the 247th RCC (Regular) Meeting
Annex C – Presentation Material of the Proposed Amendment

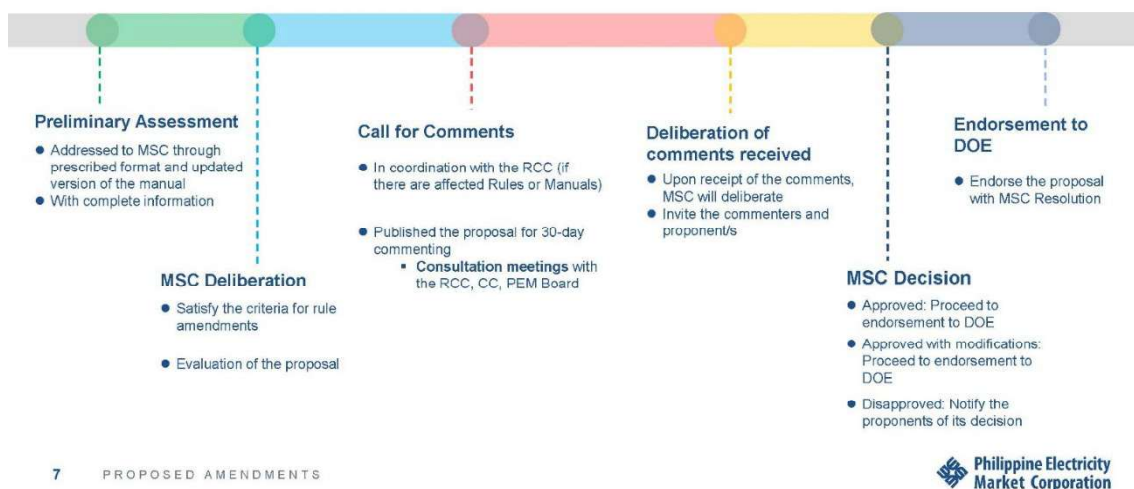
Proceedings:

Ms. Bisnar informed the body about the new rules change proposal submitted by the Market Surveillance Committee (MSC) on May 14, 2025. The proposed amendment amends the WESM Rules, Market Surveillance Manual and the Penalty Manual. The proposed amendments aims to:

1. Clarify the MSC's responsibility and procedures for reviewing rules changes in the WESM Penalty Manual.
2. Streamline the MSC's procedures.

Mr. Justin Ranier S. Chan (Proponent – MSC) further discuss the proposed amendment and the proposed process in revising the Penalty Manual.

RULES CHANGE PROCESS





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Discussions:

- **Rules Change Process for the Penalty Manual**

Mr. Orillaza asked if the proposed changes to the Penalty Manual, which will undergo a preliminary assessment, originates from stakeholders, not from the MSC. Mr. Chan confirmed this.

Mr. Orillaza also asked if the MSC had ever initiated rules change proposal for the Penalty Manual based on their studies and reports. Ms. Ira Lee P. Corectico (MSC Secretariat) responded that while the MSC can initiate such proposals to amend the Penalty Manual as necessary, they haven't submitted any to date. She confirmed that the MSC is authorized to do so.

Referring again to the proposed process, Mr. Orillaza noted that the RCC can participate in consultation Meetings. He then inquired if new penalty rules would be processed through the RCC's rules review process. Ms. Karen A. Varquez (RCC Secretariat) responded that they would not go through the RCC rules review process.

- **Scope and Approval Pathway**

Ms. Anosan asked whether the proposal intends to include the rules change process procedures within the Penalty Manual itself. Mr. Claudio added that if the WESM Rules and other WESM Manuals are affected, these rules change proposals must pass through the RCC rules review process. He pointed out that, under the proposed rules change process, MSC approval would lead to direct submission to the DOE, bypassing the PEM Board. Mr. Chan clarified that this proposed process applies only to the Penalty Manual and confirmed that any other rules change proposals will still go through the RCC rules review process. He also confirmed that an MSC-approved rules change proposal for the Penalty Manual would be endorsed directly to the DOE, without requiring PEM Board approval.

In relation to this, Ms. Anosan provided an example of other penalty provisions found in WESM Manuals, such as the Ancillary Services Monitoring Manual (ASMM). She asked if the proposed rules change process would also apply to these provisions. Ms. Corectico confirmed that any penalty provisions would undergo MSC deliberation. She also stated that the penalty provisions under the ASMM were previously deliberated and endorsed by the MSC to the DOE.

Mr. Francisco recalled that the ASMM had two separate urgent amendments, and during the RCC's deliberations at that time, there was a discussion about the Penalty Manual. He remembered the RCC deliberating on all applicable rates for ASP penalties but could not



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431 recall MSC involvement. Ms. Varquez responded that the MSC secretariat did attend
432 deliberations relevant to the ASMM provisions.
433

434 Mr. Francisco also asked if urgent amendments, which typically follow a strict timeline and
435 are guided by the DOE, also involve Penalty Manual provisions. He asked whether the
436 MSC's proposed process should distinguish between general and urgent amendments,
437 given their separate processing timelines. Ms. Anosan also asked if, since the MSC adopts
438 the RCC's rules review process, the MSC envisioned applying the same types of
439 amendments. Mr. Chan responded that their current proposal doesn't distinguish between
440 amendment types for the Penalty Manual. He stated that if such a distinction is deemed
441 necessary, the MSC would consider it.
442

443 Mr. Orillaza suggested changing the proposed title from "Rules Change Process" to
444 "Revisions to the Penalty Manual" for greater specificity.
445

- 446 • **Coordination and Concerns**
447

448 Mr. Francisco inquired if the RCC's decision would pertain to the publication of the original
449 submitted proposal. Ms. Anosan clarified that the MSC's proposal involves amendments to
450 both the WESM Rules and the Market Surveillance Manual, which will be processed by the
451 RCC. Ms. Corectico confirmed that the proposal is being presented to the RCC because it
452 includes proposed revisions to the WESM Rules and Market Surveillance Manual,
453 stemming from the MSC's processing of proposed revisions to the Penalty Manual.
454

455 Regarding the deliberation of comments on the proposed Penalty Manual amendment, Mr.
456 Virgilio C. Fortich Jr. (RCC-Distribution) asked if the RCC would not be involved and if DOE
457 endorsement would occur without RCC approval. Ms. Anosan reiterated that this only
458 applies to the proposed amendment to the Penalty Manual, and the specific proposal being
459 presented is subject to RCC's approval.
460

461 Mr. Ortiz expressed confusion, as the affected provisions in the WESM Rules and Market
462 Surveillance Manual were not presented in the meeting. Ms. Anosan responded that the
463 MSC presented a summary for the RCC's appreciation and approval for publication. She
464 added that the proposal would be discussed in detail once the commenting period
465 concludes. Ms. Bisnar also confirmed that the preliminary assessment of the proposal was
466 submitted to the RCC before the meeting on 20 May 2025.
467

468 Mr. Francisco presented a hypothetical scenario: What if comments from Chapter 8 of the
469 WESM Rules completely contradict the proposed Penalty Manual amendment, and the
470 RCC deliberates on Chapter 8? If the RCC and MSC reach entirely different decisions, how
471 would that be reconciled?
472



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473 Ms. Anosan responded that the RCC and MSC should coordinate. She explained that the
 474 proposal includes a consultation process with the RCC, which will serve as an opportunity
 475 for harmonization. This process aims to ensure that both the RCC and MSC submit
 476 consistent amendments to the PEM Board and the DOE.

477
 478 Mr. Francisco expressed concern that the RCC would not be involved in the Penalty Manual
 479 revision process. He agreed that PEMC, as a collegiate body, should endorse all matters to
 480 the DOE. However, he stressed that the procedure needs strengthening, especially the
 481 coordination between the RCC and PEMC. This coordination should cover all relevant
 482 issues, not just those in Chapter 8 of the WESM Rules, but also embrace a holistic
 483 approach to the matter.

484
 485 Mr. Claudio added that the timelines for the RCC's rules change process and the MSC's
 486 rules change process for the Penalty Manual, especially regarding proposal submission to
 487 the DOE, should be synchronized. Ms. Anosan agreed that this should be submitted as one
 488 package proposal rather than individual rules change proposals.

- 489 • ***Role of the RCC, MSC and PEM Board in Processing the revisions to the Penalty***
 491 ***Manual***

492
 493 In support of Mr. Francisco and Mr. Claudio's concerns, Mr. Orillaza also asked why the
 494 proposed amendments to the Penalty Manual would not be endorsed to the PEM Board but
 495 directly to the DOE. He opined that these amendments should also be submitted to the
 496 PEM Board. Ms. Anosan responded that the rationale for this process might stem from the
 497 fact that the Penalty Manual directly concerns stakeholders, adding that this is a point for
 498 discussion during the proposal's deliberation.

499
 500 Mr. Morallos asked for the rationale behind not involving the RCC and the PEM Board in the
 501 approval and deliberation of the amendments to the Penalty Manual. Mr. Chan responded
 502 that he was unsure of the historical reason. However, he expressed that since the Penalty
 503 Manual directly affects WESM participants, subjecting it to deliberation involving participants
 504 might dilute its effectiveness.

505
 506 Mr. Morallos said that this Penalty Manual represents the exercise of the state's police
 507 power, which only Congress holds by law, and which Congress, through EPIRA, has
 508 delegated to PEMC.

509
 510 Ms. Anosan directed the Secretariat to look for the materials that led to the delegation of the
 511 processing of the rules change proposal to the Penalty Manual is on the MSC only. She
 512 recalled that the processing of the rules changes to the Penalty Manual was proposed to be
 513 added to the power of the MSC through rules change proposal and subsequently approved
 514 by the DOE in 2006.



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515
 516 To assess the proposed amendment, Mr. Morillos shared a framework with three
 517 hierarchical criteria: Validity as the highest, followed by Feasibility, and then Viability as the
 518 lowest. He stated that the proposed amendment's rationale, focusing on the practicality of
 519 enforcing penalties, falls under the Viability criterion, while the foregoing discussion
 520 pertained to Feasibility. He then questioned whether the RCC has the power to impact the
 521 higher criterion of Validity.
 522

523 In support of Mr. Morillos' comment and in relation to the RCC's directive to the Secretariat,
 524 Mr. Francisco suggested narrowing down the scope of PEMC's power to impose penalties
 525 for WESM Rules non-compliance breaches. He cited the 2023 case of PSALM vs. ERC,
 526 where the Supreme Court emphasized PEMC's authority to sanction TP for rule breaches,
 527 without prejudicing the ERC's authority. Regarding the hierarchy Mr. Morillos mentioned,
 528 Mr. Francisco believes a hierarchy has already been established, as explained by the
 529 Supreme Court in that case.
 530

531 Ms. Anosan highlighted that the MSC is also part of PEMC. She pointed out that the
 532 concern being raised relates to the actors in the Penalty Manual's rules change process. As
 533 previously mentioned, the proposed amendment carved out the processing of Penalty
 534 Manual revisions from the RCC and delegated it to the MSC. She emphasized that the role
 535 and responsibility remain with PEMC, but with a different body within PEMC handling it.
 536

537 Regarding the publication of the rules change proposal, Mr. Morillos stated that the
 538 committee must consider the proposal substantial. Ms. Anosan responded that the role of
 539 the RCC and PEM Board in approving Penalty Manual revisions is a substantive issue that
 540 can be discussed during the proposed amendment's deliberation.
 541

- 542 • ***Presentation of the Preliminary Assessment and the Timeline of Activities***

543
 544 Ms. Bisnar presented the Preliminary Assessment of the proposed amendment as well as
 545 timeline of activities, outlining target deadlines and their corresponding activities. The RCC
 546 noted and concurred with the goal of meeting these target deadlines.
 547

548 Agreement/s:

- 549
- 550 ✓ The RCC approved the publication of the proposed amendment in the PEMC website.
- 551 ✓ The Secretariat is directed to conduct research historical documentation pertinent to the
- 552 delegation of authority for the MSC to submit penalty manual changes directly to the DOE.
- 553
- 554
- 555
- 556



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7.0 Other Matters

7.1 Update on Proposed Amendments

- Presenter/s: Ms. Mary Rose L. Bisnar
- Action Requested: For information
- Material/s: Annex A – Presentation Materials

Proceedings:

Mr. Bisnar presented the updates on the rules change proposal, as follows:

Status	Topic
Proposed Amendment's awaiting DOE's Approval	<ol style="list-style-type: none"> 1. Interruptible Load Program 2. Rules Change Process 3. Dispatch Schedules below Minimum Stable Load 4. Further revision to the Urgent Amendment to the Ancillary Service Monitoring Manual
General Amendments under RCC Evaluation or Finalization	<ol style="list-style-type: none"> 1. Validation Process of Reported Discrepancies in the Dispatch Instruction Report (DIR) 2. Market Surveillance Committee Processes
Urgent Amendment Approved by the PEM Board / Ongoing Implementation	<ol style="list-style-type: none"> 1. Dispatch Schedules below Minimum Stable Load 2. Further revision to Urgent Amendment on the Ancillary Service Monitoring Manual
Disapproved by DOE	<ol style="list-style-type: none"> 1. Enforcement and Compliance Manual in Alignment with Penalty Manual
Deferred Proposals	<ol style="list-style-type: none"> 1. Must-Offer Rule (MOR) 2. No Outstanding Balance 3. Electric Retail Aggregation Program 4. Energy Storage Systems (ESS)

In reference to the disapproved proposed amendment to the Enforcement and Compliance Manual related to the Penalty Manual, Ms. Bisnar informed the body that PEMC will resubmit a proposal concerning enhancements to the Enforcement and Compliance Office (ECO) processes but excluding the provisions pertaining to penalties.

On the proposal regarding the Rules Change Process, Ms. Bisnar informed the RCC that the PEM Board approved the RCC's recommended response to DOE as presented by Ms. Anosan during the PEM Board meeting on 19 June 2025.

Agreement/s:

- ✓ The RCC noted updates on the proposed amendments.
- ✓ The Secretariat shall draft a letter requesting updates on the proposed amendments under DOE's finalization.



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7.2 DOE Updates

There are no updates from the DOE.

7.3 Schedule of Activities

- Presenter/s: Ms. Mary Rose L. Bisnar (Secretariat)
- Action Requested: For information
- Material/s: Annex A – Presentation Material of the 247th RCC (Regular) Meeting

Proceedings:

Mr. Bisnar presented the following schedule of activities, for RCC's information:

Meetings	Schedule
RCC Meeting	18 July 2025
	15 August 2025
	December 2025 (Face-to-Face)
BRC Meeting	(No schedule for BRC for June 2025)
PEM Board Meeting	28 May 2025

Agreement/s:

- ✓ The RCC noted the schedule of activities and the reminders.

8.0 Adjournment

The meeting was adjourned at 12:18 PM.



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Prepared by:



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

Reviewed by:

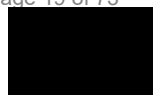


KAREN A. VARQUEZ
Rules Review Sr. Manager
Market Assessment Group

Noted by:



BIENVENIDO C. MENDOZA, JR.
Chief Market Assessment Officer





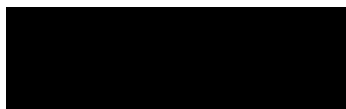
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Approved by:



RACHEL ANGELA P. ANOSAN
Chairperson, Independent



JESUSITO G. MORALLOS
Member, Independent



JORDAN REL C. ORILLAZA
Member, Independent



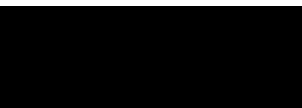
EMMANUEL GENESIS T. ANDAL
Member, Independent



DIXIE ANTHONY R. BANZON
Member, Generation Sector
Masinloc Power Partners Co. Ltd. (MPPCL)



JAYSON A. FRANCISCO
Member, Generation Sector
Aboitiz Power Corp. (APC)

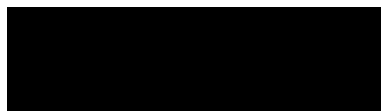


CARLITO C. CLAUDIO
Member, Generation Sector
Millennium Energy, Inc./Panasia Energy, Inc.
(MEI/PEI)

MARK D. HABANA
Member, Generation Sector
Vivant Corporation – Philippines (Vivant)



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



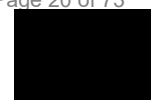
VIRGILIO C. FORTICH, JR.
Member, Distribution Sector
Cebu III Electric Cooperative, Inc. (CEBECO II)



RUSSEL S. ALABADO
Member, Distribution Sector
Angeles Electric Corporation (AEC)



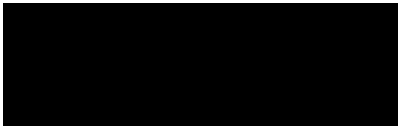
NELSON M. DELA CRUZ
Member, Distribution Sector
Nueva Ecija II Area 1 Electric Cooperative, Inc.
(NEECO II – Area I)



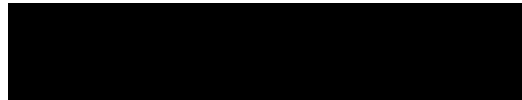


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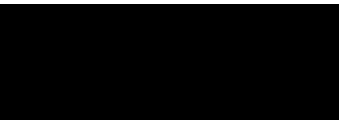
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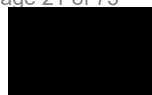
GIAN KARLA C. GUTIERREZ
Member, Supply Sector
First Gen Corporation (FGEN)



(Attended by Mr. Kristoffer Monico S. Ng)
ISIDRO E. CACHO, JR.
Member, Market Operator
Independent Electricity Market Operator of the
Philippines (IEMOP)



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





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Annex A – Presentation Material of the 247th RCC (Regular) Meeting

The slide content is set against a dark blue background with a faint grid pattern. A yellow diagonal stripe is on the left side. The PEMC logo is in the top right. The main title "247TH RCC (REGULAR) MEETING" is centered in white. Below it, the date and location "20 JUNE 2025 | PEMC Board Room" are also centered. At the bottom, there is a white box containing a "DATA PRIVACY NOTICE" in yellow, followed by white text explaining the recording of the meeting and providing contact information for the Rules Review Division and the Data Protection Officer (DPO).


Philippine Electricity Market Corporation

247TH RCC (REGULAR) MEETING

20 JUNE 2025 | PEMC Board Room


Philippine Electricity Market Corporation

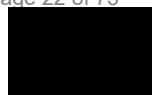
DATA PRIVACY NOTICE

PLEASE BE INFORMED THAT THE **247TH RCC (REGULAR) MEETING** WILL BE RECORDED USING MS TEAMS FOR DOCUMENTATION PURPOSES AND KEPT IN MICROSOFT SHAREPOINT UNTIL SUCH PURPOSE IS ATTAINED OR THE RETENTION PERIOD AS MANDATED BY PEMC'S INFORMATION SECURITY AND DOCUMENTED INFORMATION POLICY HAS LAPSED.

YOUR VIDEO AND AUDIO MAY BE RECORDED.

BY CONTINUING TO STAY IN THIS MEETING, YOU CONSENT TO THIS RECORDING.

FOR ANY QUESTIONS, FEEL FREE TO CONTACT **RULES REVIEW DIVISION** AT MAG_RRD@WESM.PH AND/OR THE DPO AT DPO@WESM.PH





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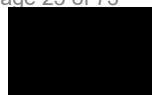
Annex A – Presentation Material of the 247th RCC (Regular) Meeting

God our Father, we gather as your faithful servants and stewards of the resources you have given our nation.

We pray for wisdom that our deliberations in our RCC meeting will consistently be based on the best interest of WESM (in particular) and the government and the Filipino nation (in general), we are sworn to serve.



We pray for courage and boldness to face the challenges that we may meet in the course of performing our task, that calls for the highest standards of honesty, integrity and competence, in order to preserve the trust and confidence given to us by our people.



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Annex A – Presentation Material of the 247th RCC (Regular) Meeting

We pray that this nation will be able to achieve transparent and reasonable prices of electricity, in a regime of free and fair competition and full public accountability, to achieve greater operational and economic efficiency.

5

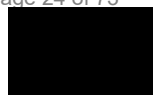


We call on you Heavenly Father to remind us that you can see through our hearts and know our innermost thoughts and intentions.

Guide us every step of the way as we strive to contribute our part for honest and efficient governance so deserved by our people.

These we ask in the name of Jesus Christ, your Son. Amen.

6



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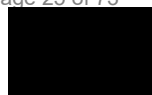
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CALL TO ORDER



DETERMINATION OF QUORUM





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DETERMINATION OF QUORUM

Representation/ Sector	Principal Member / Alternate Member		Attendance	
Independent	Rachel Angela P. Anosan			
	Jesusito G. Morillos			
	Jordan Rel C. Orillaza			
	Emmanuel Genesis T. Andal			
Generation	Dixie Anthony R. Banzon	Michael Valer G. Mariano		
	Jayson A. Francisco	Charm Krizia L. Medina		
	Carlito C. Claudio	Jessie B. Victorio		
	Mark D. Habana	Michelle S. Tuazon		
Distribution	Ryan S. Morales	Manuel Luis Zagala		
	Russel S. Alabado	Alfredo C. Sanaga, Jr.		
	Virgilio C. Fortich, Jr.	Getulio Z. Crodua		
	Nelson M. Dela Cruz	Darwin T. Daymiel		
Supply	Gian Karla C. Gutierrez	Bryan Alvin A. Calasanz		
Transmission	Darryl Lon A. Ortiz	Clark N. Agustin		
Market Operator	Isidro E. Cacho, Jr.	Kristoffer Monico S. Ng		



ADOPTION OF THE AGENDA





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ADOPTION OF THE AGENDA

Proposed Agenda	Presenter	Action Required
I. Call to Order		
II. Determination of Quorum		
III. Adoption of Agenda	Secretariat	For approval
IV. Draft Minutes of Previous Meetings <ul style="list-style-type: none"> 246th RCC (Regular) Meeting, 16 May 2025 	Secretariat	For approval
V. Matters Arising from Previous Meeting		
5.1 Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancies in Dispatch Instruction Report <ul style="list-style-type: none"> <i>Deliberation of Proposal</i> 	Secretariat/Engr. Chistian J. Del Rosario (NGCP)	For deliberation and approval
VI. New Business		
6.1 Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Market Surveillance Committee Processes <ul style="list-style-type: none"> <i>Presentation of the Proposal</i> 	Secretariat/Mr. Justin Ranier S. Chan, Ph.D. (MSC)	For approval of publication

11



ADOPTION OF THE AGENDA

Proposed Agenda	Presenter	Action Required
VII. Other Matters		
7.1 Update on Proposed Amendments	Secretariat	For information
7.2 DOE Updates	DOE Observers	For information
7.3 Schedule of Activities	Secretariat	For information
VIII. Adjournment		

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Annex A – Presentation Material of the 247th RCC (Regular) Meeting



IV. DRAFT MINUTES OF PREVIOUS MEETING

- 246th RCC (Regular) Meeting, 16 May 2025



V. MATTERS ARISING FROM PREVIOUS MEETING



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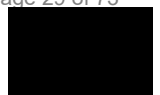


5.1 PROPOSED AMENDMENTS TO THE WESM MANUAL ON DISPATCH PROTOCOL RELATIVE TO THE VALIDATION PROCESS OF REPORTED DISCREPANCIES IN DISPATCH INSTRUCTION REPORT



ACTION REQUESTED

- For deliberation and approval





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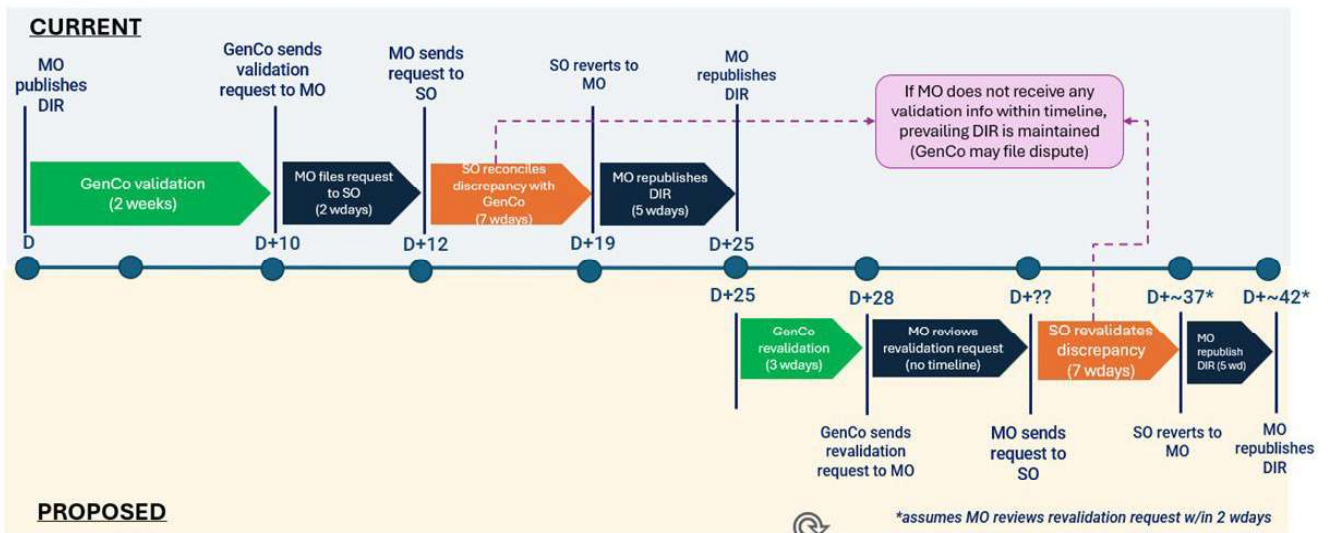
Annex A – Presentation Material of the 247th RCC (Regular) Meeting

BACKGROUND OF THE PROPOSAL

Proponent:	National Grid Corporation of the Philippines (NGCP)
Date Submitted:	15 January 2025
Rationale:	The proposal proposed to enhance the validation process of reported discrepancies in the Dispatch Instruction Report and amend the prescribed timeline to provide the System Operator, Market Operator and Generator Companies a sufficient period to assess and validate reported discrepancies thoroughly.
Affected Document:	WESM Dispatch Protocol Manual 22.1



SUMMARY OF PROPOSED AMENDMENT



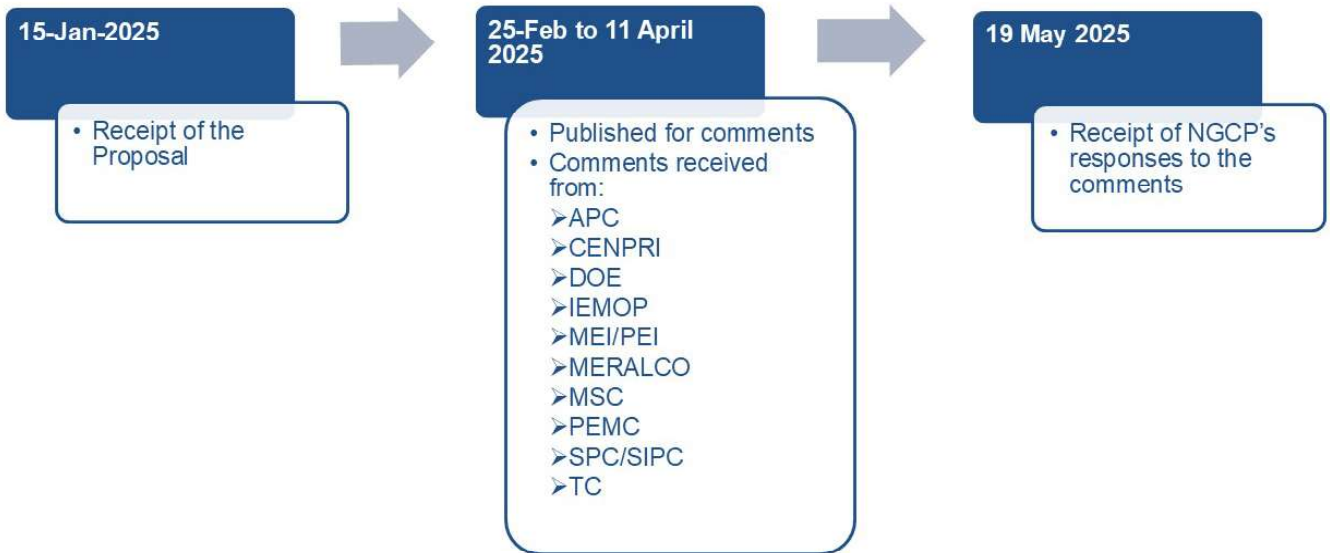


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TIMELINE OF ACTIVITIES



TIMELINE OF ACTIVITIES

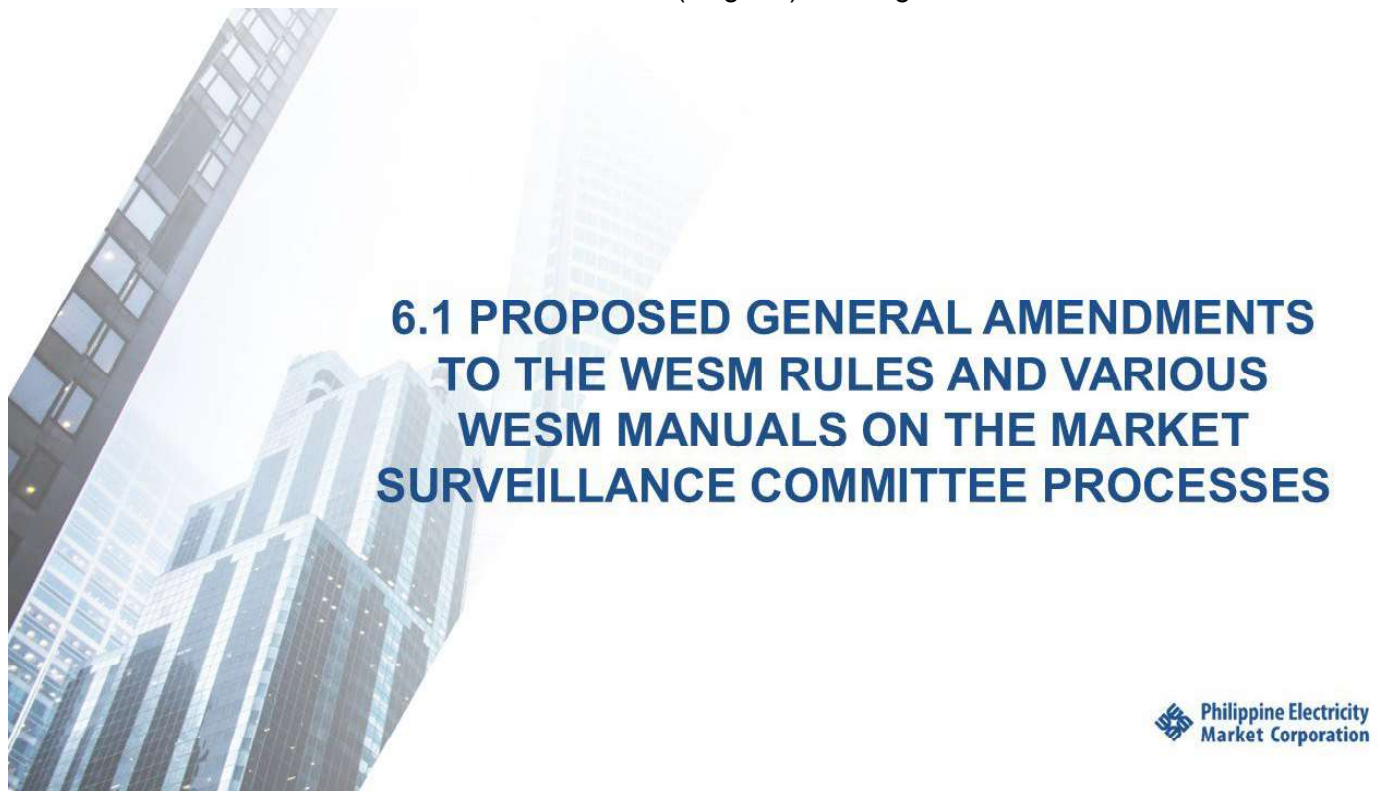




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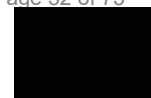
6.1 PROPOSED GENERAL AMENDMENTS TO THE WESM RULES AND VARIOUS WESM MANUALS ON THE MARKET SURVEILLANCE COMMITTEE PROCESSES



ACTION REQUESTED

- For approval of publication of the proposal in the PEMC Website.

6.1 PROPOSED AMENDMENTS TO THE WESM RULES AND WESM MANUAL ON PROCEDURES FOR CHANGES TO THE WESM RULES, RETAIL RULES, AND MARKET MANUALS





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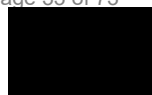
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BACKGROUND OF THE PROPOSAL

Proponent:	Market Surveillance Committee (MSC)
Date Submitted:	14 May 2025
Rationale:	The proposed amendment aims to: <ul style="list-style-type: none"> clarify the MSC’s responsibility and procedures for the review of rules changes in the WESM Penalty Manual; and, streamline MSC’s procedures.
Affected Document:	WESM Rules WESM Penalty Manual 3.0 WESM Market Surveillance Manual 2.0



TIMELINE OF ACTIVITIES



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VII. OTHER MATTERS



7.1 UPDATE ON THE PROPOSALS





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UPDATES ON THE PROPOSALS

Urgent Amendments

	Proposal	Proponent	Update/Status
1	Proposed Urgent Amendments on WESM Manual on Dispatch Protocol (WESM DP) on Issuance and Coverage of Dispatch Schedules below Minimum Stable Load	PEMC	<ul style="list-style-type: none"> 23 October 2024 – Approval of proposal (PEM Board Resolution No. 2024-77-05) 26 March 2025 – Extension of effectivity (PEM Board Resolution No. 2025-82-03) Effectivity of WESM DP Issue 21.1: 25 October 2024 to 23 October 2025
2	Proposed Revision to the Urgent Amendments to the Ancillary Services Monitoring Manual (WESM ASMM) regarding Reserve Conformance Standards and related Enforcement Actions	PEMC	<ul style="list-style-type: none"> 10 December 2024 - Approval of proposal (PEM Board Resolution No.2024-79-01) 28 May 2025 – Extension of effectivity PEM Board Resolution No. 2025-85-03 Effectivity of the WESM ASMM Issue 1.2: 12 December 2024 to 12 December 2025



UPDATES ON THE PROPOSALS

General Amendments – Under RCC Evaluation (3)

	Proposal	Proponent	Update/Status
1	Proposed Revision to the Urgent Amendments to the Ancillary Services Monitoring Manual regarding Reserve Conformance Standards and related Enforcement Actions	PEMC	<ul style="list-style-type: none"> Comments received from ACEN, APC, MEI/PEI, MERALCO, MSC, SMGP, SNAP, SPC/SIPC, and NGCP 21 Feb and 14 Mar 2025 – RCC deliberation 08 May 2025 – RCC approval of proposal (RCC Resolution No. 2025-02) 28 May 2025 – PEM Board approval of proposal (PEM Board Resolution No. 2025-85-02)
2	Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancies in the Dispatch Instruction Report	NGCP	<ul style="list-style-type: none"> Commenting period: 25 February 2025 to 11 April 2025 Comments received from APC, CENPRI, DOE, IEMOP, MEI/PEI, MERALCO, MSC, PEMC, SPC/SIPC, and TC 20 Jun 2025 - RCC Deliberation





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UPDATES ON THE PROPOSALS

General Amendments – Under RCC Evaluation (3)

	Proposal	Proponent	Update/Status
3	Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Market Surveillance Committee Processes	MSC	<ul style="list-style-type: none"> 14 May 2025 – Submission of the proposal 20 Jun 2025 – Presentation of the proposal to the RCC, for approval of publication for comments in the PEMC website.



UPDATES ON THE PROPOSALS

General Amendments – RCC Evaluation Deferred (4)

	Proposal	Proponent	Update/Status
1	Proposed General Amendments to the Retail Rules and Retail Manual on Market Transaction Procedures on No Outstanding Balance (Harmonization with ERC Resolution No. 01, Series of 2023)	IEMOP	<ul style="list-style-type: none"> Deferred deliberation pending ERC's issuance of Omnibus Retail Electricity Market Rules. 28 August 2024 – ERC officially released the ERC Resolution No. 13, Series 2024. 29 August 2024 – RCC letter to IEMOP requesting for the updates on the proposals 05 September 2024 – IEMOP to update RCC when IEMOP finalizes its action plan 20 September 2024 – Deferred. Awaiting IEMOP's submission of the revised proposal 05 March 2025 – RCC letter to IEMOP requesting updates 07 March 2025 – IEMOP to submit substitute proposal
2	Proposed General Amendments to the WESM Rules, Retail Rules and Market Manuals on the Implementation of Electric Retail Aggregation Program	IEMOP	<ul style="list-style-type: none"> Deferred deliberation pending ERC's issuance of Omnibus Retail Electricity Market Rules. 28 August 2024 – ERC officially released the ERC Resolution No. 13, Series 2024. 29 August 2024 – RCC letter to IEMOP requesting for the updates on the proposals 05 September 2024 – IEMOP to update RCC when IEMOP finalizes its action plan 20 September 2024 – Deferred. Awaiting IEMOP's submission of the revised proposal 05 March 2025 – RCC letter to IEMOP requesting updates 07 March 2025 – IEMOP to submit substitute proposal





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UPDATES ON THE PROPOSALS

General Amendments – RCC Evaluation Deferred (4)

	Proposal	Proponent	Update/Status
3	Proposed General Amendments to the WESM Rules and various WESM Market Manuals regarding Energy Storage Systems in view of the DOE DC2023-04-0008	IEMOP	<ul style="list-style-type: none"> Commenting period 22 August 2024 to 07 October 2024 Received comments from MERALCO, MEI/PEI, SPC/SIPC, MGEN, SNAP, APC, NGCP, ACEN, PEMC, and Technical Committee (TC) 13 December 2024 - Deferred (As requested by proponent) proposal pending the forthcoming issuance of the ERC Rules on Energy Storage Systems
4	Proposed Amendment to the WESM Rules and WESM Manual on Dispatch Protocol regarding Must-Offer Rule	GNPK	<ul style="list-style-type: none"> 18 October 2024 – RCC deferred deliberations pending DOE's response to GNPK 25 October 2024 – GNPK letter to DOE on issues and concerns (cc RCC) 05 March 2025 – RCC letter to GNPK requesting for updates on the proposal



UPDATES ON THE PROPOSALS

General Amendments – For DOE Promulgation (3)

	Proposal	Proponent	Update/Status
1	Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Interruptible Load Program Implementation	IEMOP	<ul style="list-style-type: none"> 31 January 2024: Approval of proposal (PEM Board Resolution No. 2024-68-03) DOE Public Consultations: April (3, 17, 24) 2024
2	Proposed Amendments to the Rules Change Process	RCC	<ul style="list-style-type: none"> 28 August 2024 – Approval of proposal (PEM Board Reso No. 2024-75-01) 25 September 2024 – Endorsed to the DOE 13 May 2025 – PEM Board received DOE's letter 20 May 2025 – RCC letter to PEM Board and WGO submitting recommendations 19 June 2025 (85th PEM Board Meeting) – PEM Board approved the RCC's response, which affirms its commitment to abide with the DOE directive and also raise the concern on the possibility of allowing the extension of the four-month evaluation period.





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UPDATES ON THE PROPOSALS

General Amendments – For DOE Promulgation (3)

	Proposal	Proponent	Update/Status
3	Proposed General Amendments on WESM Manual on Dispatch Protocol on Issuance and Coverage of Dispatch Schedules regarding Minimum Stable Load	PEMC	<ul style="list-style-type: none"> 26 March 2025 – Approval of proposal (PEM Board Resolution No. 2025-82-03) 24 April 2025 – Submitted to DOE for approval and ERC for information



UPDATES ON THE PROPOSALS

General Amendments – Disapproved by the DOE

	Proposal	Proponent	Update/Status
1	Proposed Amendments to the WESM Rules and WESM Manuals on Penalty, and Enforcement and Compliance	PEMC	<ul style="list-style-type: none"> 31 Jan 2024: Approval of proposal (PEM Board Resolution No. 2024-68-06) DOE conducted Public Consultation: 3 April 2024, 17 April 2024 and 23 April 2024 11 April 2025 – Letter to PEMC from DOE on the disapproval of the Proposed Amendments to the WESM Rules and WESM Manuals on Penalty, and Enforcement and Compliance





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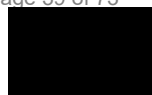
UPDATES ON THE PROPOSALS

General Amendments – For DOE's Response

	Proposal	Proponent	Update/Status
1	Proposed General Amendments to the WESM Manual on Dispatch Protocol regarding Non-security Over-riding Constraints	NPC	<ul style="list-style-type: none"> 25 March 2024 – Per RCC advise, NPC elevated concerns to DOE 17 May 2024 – RCC approved Reso on the conclusion of NPC's Proposal for endorsement to PEM Board 31 July 2024 – PEM Board concurred with the RCC's decision to conclude the National Power Corporation's (NPC) proposed rules change



7.2 DOE UPDATES





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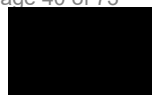


7.3 SCHEDULE OF ACTIVITIES



SCHEDULE OF ACTIVITIES

<ul style="list-style-type: none">• 18 July 2025• 15 August 2025 <p>RCC Meetings</p>	<ul style="list-style-type: none">• No schedule for BRC Meeting for June 2025 <p>BRC Meeting</p>	<ul style="list-style-type: none">• 19 June 2025• (Agenda: Response to the DOE's directive regarding the <i>Proposed Amendment to the WESM Rules and Rules Change Manual</i>) <p>PEM Board Meeting</p>
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VIII. ADJOURNMENT



A hand is shown holding a smartphone. The screen of the phone displays a white power plug icon on a blue background. The entire lower half of the page is set against a background of a large yellow diagonal shape and a blurred image of a person's face.

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Annex B – Matrix of the Proposed Amendment to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancy in Dispatch Instruction Report (DIR)
Proposed Amendments to the WESM Manual on Dispatch Protocol Issue 22.1

Commenter	General Comments	Proponent's Response
PEMC	<p>1. What are reasons/examples why the System Operator and a Generation Company are unable to reconcile DIR discrepancies within one validation process that makes an additional revalidation process necessary?</p> <p>2. For Market Operator's clarification: DPM Sections 14.4.9 and 17.5.3 provides the following statements on which information shall be considered valid if it does not receive any validation from the System Operator within the prescribed timeline:</p> <ul style="list-style-type: none"> • Sec. 14.4.9 (under "Sec 14. Post-dispatch Data and Operation Reports") – the MO shall consider the published DIR valid • Sec 17.5.3 (under "Sec 17. Management of Must-Run Units") – the MO shall consider the Generation Company's submitted discrepancy as valid. <p>Requesting clarification from MO if, pursuant to Sec. 17.5.3 above, it has a separate treatment of MRU data apart from all other data in the DIR such that a Generation Company's discrepancy report related to MRUs is considered valid?</p> <p>3. For MO: How might an extended DIR validation process, as being proposed, affect the processing of additional compensation for the concerned Generation Company?</p> <p>4. For information and clarification: On Impact to Compliance Monitoring Process</p> <p>The proposed amendment to the Dispatch Instruction Report (DIR) validation/revalidation timeline will not affect the compliance monitoring activity of ECO, particularly in Dispatch Conformance Standards (DCS) and Reserve Conformance Standards (RCS) monitoring, in terms of: (a) verifying re-dispatch instructions of SO; and (b) identifying potential non-compliance of Dispatchable Reserves (DR) with RCS 6-8. Our flagging tool utilizes the DIR received daily via FTP from Independent Electricity Market Operator of the Philippines (IEMOP), particularly the DR utilization (MW_TO) instructions included in the report.</p> <p>If such information is subject to revalidation, providing both validated and revalidated DIRs through IEMOP via the established data provision protocol between PEMC and IEMOP (via FTP) would help avoid disruptions to the current DIR data processing setup of PEMC. Additionally, will we also be able to identify which versions are the latest or have been revalidated?</p>	<p>1.</p> <ol style="list-style-type: none"> a. Incorrect application of tags by generators, specifically regarding Merit Order Table (MOT Raise), Must-Run Unit (MRU), Ancillary Services (AS), Market Intervention/Suspension (MI/MS) classifications [e.g. The generator submitted a claim for MOT Raise despite being knowingly scheduled and instructed by the System Operator (SO) to operate as an Ancillary Service – Dispatchable Reserve (AS-DR)] b. Inconsistencies in the reported megawatt (MW) values and corresponding durations [e.g. from TP 60 MW to SO 50 MW] c. DIR Discrepancy Claims are submitted without the necessary supporting documents. [Generators utilize a prescribed Excel template provided by the Market Operator (MO)] <p>2-4. We defer these queries to MO</p> <p>Notes:</p> <ol style="list-style-type: none"> 1. DIR is a report containing the dispatch instructions of the System Operator to the Plant Operator of which both are shift-on-duty personnel (WESM DP s.14.4.2) 2. DIR Discrepancy Claims are filed by trading participants to support claims for <u>additional compensation</u> when designated as MRU/MOT by SO (WESM PDM s.8.3.1) 3. Determination of quantity or volume considered for additional compensation are based on DIR (WESM PDM s.8.3.4) 4. SO submits the DIR to the MO on a weekly basis, after which the MO publishes it on its website. MO also publishes daily DIR on its website. 5. Based on 5-year records, there were 303 requests for validation, of which 57% were coming from a single Trading Participant. A total of 293 (97%) requests had been resolved. There were only two (2) TP requests for re-validation for the remaining requests as consolidated by the concerned Trading Participants. 6. Requests for re-validation typically occur a month or more after the initial validation which is beyond the prescribed timeline. [e.g. a generator requested for re-validation after 4 months from the initial validation]

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Commenter	General Comments	Proponent's Response
	<p>The revalidated DIRs will be useful for the ECO in validating and assessing claims related to DIR discrepancies raised by the Trading Participants and the Ancillary Services Providers (ASPs). Even with the additional seven (7) days for revalidation by the System Operator, these documents remain relevant during the monitoring with the DCS per monitoring cycle, and the Request for Reassessment (RRA) stage of the RCS, occurring within two (2) months of the relevant billing period.</p>	
Meralco	<p>May we ask the reasons for these discrepancies that would necessitate the proposed additional ten working days for revalidation?</p> <p>Introducing additional time for revalidation would lead to larger and more frequent deviations between the preliminary and final bills. This would distort the price signals from the market.</p>	Please see list of reasons as stated above.
SPC Power Corporation / SPC Island Power Corporation (SPC/SIPC)	<p>We suggest that the validation and further validation (revalidation) process on the discrepancies in the Dispatch Instruction Report (DIR) be integrated/included in the Central Registration and Settlement System (CRSS) since the data of the DIR are settlement issues. Thru CRSS parties (System Operator-SO, Market Operator-MO and Generation Companies) can monitor the updates and outcome of the process.</p> <p>Our companies usually sent our DIR discrepancies thru MO's Central Ticketing System, however the SO is not performing joint reconciliation with our companies, to wit "14.4.9 The System Operator shall perform reconciliation with the Generation Company", as a result when the DIR validation from the SO is received and posted by the MO in their public website, there were instances that we further seek clarification and contest the validated data that was sent/mailed to us (and also posted in the public website) by the MO. But the MO will insist that their validation process is finished/over and had email/final reply to us and to wit:</p> <p>"Should you have further concerns, you may contact Mr. Joselito Quilala of NGCPs System Operations through his email jcquilala@ngcp.ph. Thank you."</p> <p>As we contacted the above SO's contact, they are not aware on the further validation process and did not know the moving forward on how to change the uploaded/posted validated report in the MO's public website, merely because of no SO and MO protocols on further validation process.</p> <p>With the above circumstances, our companies incurred financial losses on our generated power due to (1) lack of initiative of joint reconciliation of the SO with the Generation</p>	The proposed re-validation process will address the concerns of SPC.

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Commenter	General Comments	Proponent's Response
	<p>companies, and (2) due to deficiency of protocols on the further validation process of MO and SO.</p> <p>Thus, we hope that this revisiting of the DIR discrepancy process will give the best and clearest protocols among the SO, MO and Generation Companies.</p> <p>Also, we hope that in order to avoid DIR discrepancies or DIR undeclared occurrences with generating plants, the SO will religiously, dutifully and correctly log all the dispatch instructions to all generating plants every dispatch interval. If the above situation (religiously, dutifully and correctly log all the dispatch instructions to all generating plants every dispatch interval) is being done by the SO, no further burdens or inconveniences will be experienced by generating plants and MO.</p> <p>May we further know the following:</p> <ol style="list-style-type: none"> 1. How many revalidation process can be permitted? 2. Can PEMC-ECO investigate (thru its motu proprio) why the SO have DIR discrepancies or DIR undeclared occurrences with generating plants since all DIRs are obligation and compliance from the SO? 3. How can the SO mitigate/avoid the DIR discrepancies or DIR undeclared occurrences with generating plants which been lingering/present in the WESM for many years? 	<ol style="list-style-type: none"> 1. Only a single re-validation process will be conducted. 2. More than half of DIR Discrepancy Claims often arise from the trading behavior of SPC. SPC was initially scheduled as DR and instructed by SO to operate as AS-DR. In subsequent dispatch intervals, SPC is no longer available for DR but would claim for additional compensation as MOT. This behavior compromises the security of the grid, as SO must find another available scheduled DR within a limited time. 3. SO has implemented measures to enhance the recording of all dispatch instructions, including improvements to the logging system and procedural practices. As a result of these enhancements, from 13 TPs who submitted for DIR Discrepancy Claims in the past 5 years, only two TPs now submits discrepancies on a <u>regular</u> basis. Again, more than half of filed DIR Discrepancy claims came from SPC.
Aboitiz Power Corporation (APC)	*Semantic change from “working day” to “calendar day” if the intention is to refer to the WESM operations to eliminate ambiguity.	We prefer ‘working day’ to prevent deadlines from falling on days when no one is available to respond or process requests.
Millennium Energy, Inc./ Panasia Energy, Inc. (MEI/PEI)	We support the proposal of the Proponent of adding a provision for the revalidation of discrepancy claims. This proposed amendment will provide the Generation Company the opportunity of reporting further discrepancies in the published Dispatch Instruction Report and requesting revalidation of the reported discrepancies. We have experienced in the past a number of discrepancies which were not considered or were missed out during the initial validation process.	Thank you for your support.
Technical Committee	1. To provide further context and justification for the proposed amendments, the proponent should present relevant data detailing the reported discrepancies that led to	1. Reported discrepancies consisted of dispatch instructions (MRU/MOT Raise) required for claiming additional compensation. Please see related details above.

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Commenter	General Comments	Proponent's Response
	<p>the System Operator's validation and revalidation of DIR. This should include historical information about the validation periods conducted by the System Operator</p> <ol style="list-style-type: none"> The term 'validation' or 'revalidation' is more appropriate than 'reconciliation,' which is typically associated with the WESM settlement process. The criteria for determining valid discrepancies in the DIR should be clearly defined and clarified. Conduct further review of other WESM Manuals that may be affected by this proposal, noting that the proposed amendments could impact other processes in the WESM, such as billing and settlement. Consider incorporating the flagging of trading participants undergoing validation or re-validation of DIR into the MO process, if this activity is not yet in place. 	<p>We defer the remaining comments to MO and PEMC.</p>
Independent Electricity Market Operator of the Philippines (IEMOP)	<p>If to be adopted, the proposed revalidation process should be limited to a specific set of grounds. In this regard, it must be noted that (i) the proposed revalidation is simply a duplication of the present validation process; and (ii) the current provisions on the validation of dispatch instruction report already requires the System Operator and the concerned Generation Company to perform reconciliation. Any discrepancy, therefore, should have already been threshed out by the System Operator and the Generation Company during the initial validation process. Thus, if adopted, the avilment of the revalidation process should be limited to exceptionally meritorious cases.</p>	<p>In most cases (97%), discrepancies have been already threshed out in the initial validation. Despite efforts to improve the DIR process, discrepancies can still arise due to various factors such as trading behavior of TPs.</p>

WESM Manual on Dispatch Protocol Issue 22.1								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Decision
Post-dispatch Reports and Information	WESM DP 14.4.9	14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt	14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the Market Operator.	Rationale of the Proposal To include a provision for the revalidation process of data contained in the Dispatch Instruction Report should the Generator Companies submit a request for	<p><u>TC:</u></p> <p>(1) Please explain the "reconciliation" process in DP 14.4.9.</p> <p>(2) Is this associated with DP 12.5.2 Detection of-Non-Compliance and Possible Breach?</p> <p>(3) How are the Post Dispatch Reports and Information in DP 14.4 used in DP 12.5.2?</p>	<p><u>TC:</u></p> <p>In addition to the comments, suggest adding "from the System Operator" to improve clarity as follows:</p> <p>14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies</p>	<p><u>For TC:</u></p> <p>(1) The "reconciliation process" begins when MO sends an Excel (CSV) template containing the TPs expected Dispatch Instruction and MW_TO. SO will then verify the TP data against SO data and confirm its accuracy with the Regional SO.</p> <p>(2) The proposed provision is not related DP s.12.5.2</p> <p>(3) MO handles the process in DP s.12.5.2</p> <p>(4) We defer this question to MO as they evaluate TPs DIR Discrepancy Claim before SO validation. TPs' concerns primarily revolve around dispatch instructions related to additional compensation.</p>	

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WESM Manual on Dispatch Protocol Issue 22.1								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Decision
		of the request from the Market Operator. If the Market Operator has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained. If the Generation Company claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.	<u>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report these to the Market Operator within three (3) working days from the receipt of the report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u> If the Market Operator has not received any	further validation of the System Operator's submitted report on the discrepancy claims.	(4) What are the valid reasons for TPs to contest post-dispatch reports which concerns them?	within seven (7) working days from the receipt of the request from the Market Operator. If the Market Operator has not received any validation within the prescribed timeline from the System Operator , the published data from the Dispatch Instruction Report shall be maintained. If the Generation Company claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.		
					<u>MERALCO:</u> We request clarification on the rationale behind the additional seven (7) working days to revalidate the reconciliation prepared by the SO on top of the three (3) working days within which generation companies may report		<u>For MERALCO:</u> The additional seven (7) working days is adopted to be consistent with the validation period cited in the current provision.	

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WESM Manual on Dispatch Protocol Issue 22.1								
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			validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained. If the Generation Company claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.		<p>discrepancies. This brings the total additional number of working days to ten (10), not including the period within which the Market Operator is supposed to review the revalidation request.</p> <p>Instead, we recommend that the current validation process be reviewed and strengthened to eliminate the need for revalidation/ rework or request for additional days for validation within the operational timetable. Maintaining the current timeline will also reduce the likelihood of introducing additional modifications or adjustments between the preliminary and final settlement statements. Introducing additional time for revalidation would lead to larger and more frequent deviations between the preliminary and final bills. This would distort the price signals from the market.</p>			

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					<p><u>SPC/SIPC:</u></p> <p>We suggest that the validation and further validation (revalidation) process on the discrepancies in the Dispatch Instruction Report (DIR) be integrated/included in the Central Registration and Settlement System (CRSS) since the data of the DIR are settlement issues. Thru CRSS parties (System Operator-SO, Market Operator-MO and Generation Companies) can monitor the updates and outcome of the process.</p> <p><u>APC:</u></p> <p>(1) For expediency given the tight deadline, please clarify the mode of discrepancy reporting by the TP to the SO (7 wd) and MO (3 wd) respectively.</p> <p>(2) A common help desk for lodging discrepancies is strongly recommended</p>	<p><u>SPC/SIPC:</u></p> <p>14.4.9 The System Operator shall perform jointly reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies thru Market Operator's Central Registration and Settlement System (CRSS) within seven (7) working days from the receipt of the request from the Market Operator.</p> <p><u>If the Trading Participants find any further discrepancies in the submitted report thru (CRSS), the Generator Company must report these to the Market Operator within three five (35) working days from the receipt of the report thru (CRSS). The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then</u></p>	<p><u>For SPC/SIPC:</u></p> <p>We defer the suggestion regarding CRSS process to MO.</p> <p><u>For APC:</u></p> <p>We defer the recommendation on discrepancy reporting process to MO.</p>	

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					to ensure timely feedback.	<p><u>request the System Operator to re-validate the reported discrepancies thru (CRSS). The System Operator shall then provide the results of its re-validation thru (CRSS) within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>If the Market Operator has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained. If the Generation Company claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.</p>		
					APC: What is the rationale in providing 3 days	APC: 14.4.9 xxx	For APC: We defer this question to MO as they are the recipient of the report.	

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					allowance for the Generator Company to report any discrepancies found in the DIR? We would like to suggest to have the same period of allowance provided for to the System Operator i.e., 7 days.	<p><u>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report these to the Market Operator within three seven (7) working days from the receipt of the report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>xxx</p>		
					<p><u>APC:</u> Please clarify how the TP receives notification of this SO-validated discrepancy report to initiate MO re-validation.</p>		<p><u>For APC:</u> We defer this question to MO as they communicate the SO-validated discrepancy report to TP.</p> <p><u>For PEMC:</u></p>	

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					<p><u>PEMC:</u></p> <p>(1) Will the SO provide a revised DIR after its first validation? If so, requesting confirmation from the Market Operator if it shall re-publish a revised DIR based on the System Operator's revalidation, pursuant to the timeline set in the Market Information Catalogue in Annex A of the WESM Manual on MO Information Disclosure and Confidentiality (page 17).</p> <p>(2) Suggest clarifying to whom the System Operator shall provide the validated or revalidated DIR (See <i>proposed re-wording</i>)</p> <p>(3) Suggesting to itemize the proposed new paragraph to clearly distinguish the responsibilities of entities involved.</p> <p><u>CENPRI:</u></p>	<p><u>PEMC:</u></p> <p>14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide <u>the Market Operator the revised Dispatch Instruction Report based on</u> the results of its validation of the reported discrepancies-within seven (7) working days from the receipt of the request from the Market Operator.</p> <p><u>If the Trading Participants find there are any further discrepancies in the submitted report revised Dispatch Instruction Report:</u></p> <p><u>a) The Generator Generation Company must may report these the discrepancies to the Market Operator within three (3) working days from the receipt publication of the revised report.</u></p> <p><u>b) The Market Operator shall review</u></p>	<p>(1) SO only provides MO with validated DIR discrepancy claims for specific intervals and specific TP.</p> <p>On the inquiry regarding re-publication of revised DIR, we defer to MO.</p> <p>(2) Retain the term "Trading Participants" since the filing of discrepancies by a TP may involve several owned generators.</p> <p>We suggest to use the term 'validated DIR Discrepancy Claims' instead of the 'revised Dispatch Instruction Report'. The report provided by SO is the result of validating the reported discrepancies while the Dispatch Instruction Report, as cited in DP s.14.4.2, is a post-dispatch report used by TPs in filing discrepancies.</p> <p>(3) We defer the proposed new paragraph to PEMC-RCC.</p> <p>For CENPRI: We defer the proposal for request of furnished copy of documents to PEMC-RCC and MO.</p>	

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					<p>Upon submission of any discrepancy claims, Generators shall be provided a furnished copy of the revalidation request from MO to SO as well as response from SO to MO for the results. Generators shall be included in the process of validation for transparency and to conveniently monitor current status of the revalidation request.</p>	<p><u>assess the revalidation request and, if deemed found to be with have merit, shall then request the System Operator to revalidate the reported discrepancies.</u></p> <p><u>c) The System Operator shall then provide the Market Operator with a revised Dispatch Instruction Report, reflecting the revalidation results, of its revalidation, within seven (7) working days from receiving receipt of the revalidation request from the Market Operator.</u></p> <p>If the Market Operator has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained. If the Generation Company claims additional compensation related</p>		

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						to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.		
					<p><u>DOE:</u></p> <p>Under Clause 14.4.8 of the Dispatch Protocol Manual, the Market Operator (MO) requests the System Operator (SO) to validate a reported discrepancy but does not perform the validation or review of the validation request. Hence, in the revalidation process, the MO should only submit the request for revalidation to the SO, without reviewing or validating the merits of the revalidation request, since it is the SO that performs the actual revalidation.</p> <p><u>IEMOP:</u></p>	<p><u>For DOE:</u></p> <p>We defer these comments to MO to determine whether they conduct a review of DIR Discrepancy Claims in the initial request for validation or simply pass them through.</p> <p><u>For IEMOP:</u></p> <p>(1) MO should review the DIR Discrepancy Claims for both form and substance. For example, on June 20, 2023, we received a CSV file from MO containing 30,240 records (intervals) of DIR discrepancy claim by SPC. SPC claimed for MRU despite being scheduled as AS and even during intervals when it is not running.</p>		

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					(1) In relation to the requirement that the Market Operator shall review the revalidation request (i.e., if the request is impressed with merit), the Market Operator is not the proper party to review the same. In this regard, it bears stressing that it is the System Operator who is the owner of the data subject of the DIRs.			
					<p><u>MEI/PEI:</u></p> <p>What will be the basis or criteria of the Market Operator in deeming if the revalidation request is with merit?</p> <p>No timeline is specified for the Market Operator in reviewing the revalidation request. We suggest two (2) working days to be in harmony with Section 14.4.8.</p> <p>We suggest the use of the term Generation Company instead of</p>	<p><u>MEI/PEI:</u></p> <p>14.4.9 xxx <u>If the Trading Participants Generation Company finds any further discrepancies in the submitted report, the Generation Company must report these to the Market Operator within three (3) working days from the receipt of the report. Within two (2) working days from receipt of the report, the Market Operator shall review the revalidation</u></p>	<p><u>For MEI/PEI:</u></p> <p>We defer the inquiry on criteria for revalidation request to MO.</p> <p>We defer the proposal on two (2) working days for MO's timeline of review of request to MO.</p> <p>Retain the term "Trading Participants" since the filing of DIR Discrepancy Claims by a TP may involve several owned generators.</p> <p><u>For PEMC:</u></p> <p>(1) We defer the inquiries on criteria for revalidation request and related documents to MO.</p>	

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					<p>Trading Participant for consistency.</p> <p><u>PEMC:</u> (1) Against what criteria will the Market Operator determine if the Generating Company's revalidation request has merit? Based on which document will the MO and the GenCo use for the revalidation?</p> <p>(2) How many days will the Market Operator undertake the review for the revalidation? The MO's timeline for its review is not specified in the proposed amendment.</p> <p><u>MSC:</u> The MSC suggests to provide a timeline for the Market Operator's review of the revalidation request. The MSC initially proposes a three (3) working-day period, subject to confirmation and any adjustments suggested by the</p>	<p><u>request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>xxx</p> <p><u>MSC:</u> 14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies within seven (7) working</p>	<p>(2) We defer the inquiry on MO's timeline for review to MO.</p> <p><u>For MSC:</u> We defer the proposal on MO's timeline for review to MO.</p>	

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					Market Operator based on its business processes.	<p>days from the receipt of the request from the Market Operator.</p> <p><u>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report these to the Market Operator within three (3) working days from the receipt of the report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies within three (3) working days from the receipt of the revalidation request. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>If the Market Operator has not received any</p>	<p>For IEMOP: (2) We defer the proposal on MO's timeline for review to PEMC-RCC.</p>	

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					<p><u>IEMOP:</u></p> <p>(2) The proposed amendment should provide a period within which the Market Operator shall refer the request for revalidation to the System Operator. For consistency, we suggest that the period be two (2) working days from receipt of such request.</p> <p>(3) Similarly, the proposed amendment shall provide guidelines for cases where the System Operator failed to provide the results of its re-validation within the prescribed timeline. At present, the proposal only considers cases where the Market</p>	<p>validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained. If the Generation Company claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.</p> <p><u>IEMOP:</u></p> <p>14.4.9 The System Operator shall perform reconciliation with the Generation Company and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the Market Operator.</p> <p><u>If the Market Operator has not received any validation within the prescribed timeline,</u></p>	(3) We defer the proposal to PEMC-RCC.	

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					Operator has not received any validation (i.e., first validation) within the prescribed timeline. To this end, it is proposed that in cases where the System Operator failed to provide the results of its re-validation within the prescribed timeline, the data from the first validation report be maintained.	<p><u>the published data from the Dispatch Instruction Report shall be maintained.</u></p> <p><u>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report these to the Market Operator within three (3) working days from its receipt of the validation report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. Within two (2) working days from receipt of such report from the Generator Company, the Market Operator shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-</u></p>		

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						<p><u>validation within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>If the Market Operator has not received any validation revalidation within the prescribed timeline, the published data from the Dispatch Instruction Report initial validation report shall be maintained.</p> <p>If the Generation Company claims additional compensation related to the reported discrepancies that were not validated or revalidated within the prescribed timeline, the Generation Company may subject the said claim under the WESM dispute resolution process.</p>		
Reporting and Publication	WESM DP 17.5.3	17.5.3 The System Operator shall provide the results of its validation of the reported	17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies within seven (7) working	To include a provision for the revalidation process of data related to MRU	<p><u>MERALCO:</u></p> <p>We request clarification on the rationale behind the additional seven (7) working days to revalidate the</p>		<p><u>For MERALCO:</u></p> <p>The additional seven (7) working days is adopted to be consistent with the validation period cited in the current provision.</p>	

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		discrepancies within seven (7) working days from receipt of the request from the Market Operator. If the Market Operator has not received any validation within the prescribed timeline, the Market Operator shall consider the submitted discrepancies by the Generator as valid.	<p>days from receipt of the request from the Market Operator.</p> <p><u>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report these to the Market Operator within three (3) working days from the receipt of the report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u></p>	contained in the Dispatch Instruction Report should the Generator Companies submit a request for further validation of the System Operator's submitted report on the discrepancy claims.	<p>reconciliation prepared by the SO on top of the three (3) working days within which generation companies may report discrepancies. This brings the total additional number of working days to ten (10), not including the period within which the Market Operator is supposed to review the revalidation request.</p> <p>Instead, we recommend that the current validation process be reviewed and strengthened to eliminate the need for revalidation/ rework or request for additional days for validation within the operational timetable. Maintaining the current timeline will also reduce the likelihood of introducing additional modifications or adjustments between the preliminary and final settlement statements.</p>			
					<p><u>APC:</u> Please clarify how the TP receives notification of this SO-validated</p>	<p><u>APC:</u> <i>*same comment as above</i></p>	<p><u>For APC:</u> We defer this question to MO as they communicate the SO-validated discrepancy report to TP.</p>	

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			<p>If the Market Operator has not received any validation within the prescribed timeline, the Market Operator shall consider the submitted discrepancies by the Generator as valid.</p>		<p>discrepancy report to initiate MO re-validation.</p> <p><i>*same comment as above</i></p> <p><u>PEMC:</u> Same comments as Sec. 14.4.9 (See <i>proposed re-wording</i>)</p> <p><u>CENPRI:</u> Upon submission of any discrepancy claims, Generators shall be provided a furnished copy of the revalidation request from MO to SO as well as response from SO to MO for the results. Generators shall be included in the process of validation for transparency and to conveniently monitor current status of the revalidation request.</p>	<p><u>PEMC:</u> 17.5.3 The System Operator shall provide <u>the Market Operator the revised Dispatch Instruction Report based on</u> the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the Market Operator.</p> <p><u>If the Trading Participants find there are any further discrepancies in the submitted report revised Dispatch Instruction Report:</u></p> <p><u>a) The Generator Generation Company must may report these the discrepancies to the Market Operator within three (3) working days from the receipt publication of the revised report.</u></p>	<p><u>For PEMC:</u></p> <p>(1) SO only provides MO with validated DIR Discrepancy Claims for specific intervals and specific TP.</p> <p>On the inquiry regarding re-publication of revised DIR, we defer to MO.</p> <p>(2) Retain the term “Trading Participants” since the filing of discrepancies by a TP may involve several owned generators.</p> <p>We suggest to use the term 'validated DIR Discrepancy Claims' instead of the 'revised Dispatch Instruction Report'. The report provided by SO is the result of validating the reported discrepancies while the Dispatch Instruction Report, as cited in DP s.14.4.2, is a post-dispatch report used by TPs in filing discrepancies.</p> <p>(3) We defer the proposed new paragraph to PEMC-RCC.</p> <p><u>For CENPRI:</u> We defer the proposal for request of furnished copy of documents to PEMC-RCC and MO.</p>	

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						<p>b) The Market Operator shall <u>review assess the revalidation request and, if deemed found to be with merit, shall then request the System Operator to revalidate the reported discrepancies.</u></p> <p>c) The System Operator shall <u>then provide the Market Operator with a revised Dispatch Instruction Report, reflecting the revalidation results, of its revalidation, within seven (7) working days from receiving receipt of the revalidation request from the Market Operator.</u></p> <p>If the Market Operator has not received any validation within the prescribed timeline, the Market Operator shall consider the submitted discrepancies by the Generator as valid.</p>		

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						<p><u>SPC/SIPC:</u></p> <p>17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies <u>thru Market Operator's Central Registration and Settlement System (CRSS)</u> within seven (7) working days from receipt of the request from the Market Operator.</p> <p><u>If the Trading Participants find any further discrepancies in the submitted report thru (CRSS), the Generator Company must report these to the Market Operator within three five (35) working days from the receipt of the report thru (CRSS). The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported</u></p>	<p><u>For SPC/SIPC:</u></p> <p>We defer the suggestion regarding CRSS process to MO.</p>	

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						<p><u>discrepancies thru (CRSS). The System Operator shall then provide the results of its re-validation thru (CRSS) within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>If the Market Operator has not received any <u>revalidation from the System Operator</u> within the prescribed timeline, the Market Operator shall consider the submitted discrepancies by the Generator as valid.</p>		
					<p><u>MEI/PEI:</u></p> <p>What will be the basis or criteria of the Market Operator in deeming if the revalidation request is with merit?</p> <p>No timeline is specified for the Market Operator in reviewing the revalidation request. We suggest two (2) working days to be in harmony with Section 14.4.8.</p>	<p><u>MEI/PEI:</u></p> <p>17.5.3 xxx <u>If the Trading Participants Generation Company finds any further discrepancies in the submitted report, the Generation Company must report these to the Market Operator within three (3) working days from the receipt of the report. Within two (2) working</u></p>	<p><u>For MEI/PEI:</u></p> <p>We defer the inquiry on criteria for revalidation request to MO.</p> <p>We defer the proposal on two (2) working days for MO's timeline of review of request to MO.</p> <p>Retain the term "Trading Participants" since the filing of discrepancies by a TP may involve several owned generators.</p>	

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Annex B – Matrix of the Proposed Amendment to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancy in Dispatch Instruction Report (DIR)

WESM Manual on Dispatch Protocol Issue 22.1								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent’s Response	RCC Decision
					We suggest the use of the term Generation Company instead of Trading Participant for consistency	<u>days from receipt of the report, the Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u> xxx		
					<u>MSC:</u> The MSC suggests to provide a timeline for the Market Operator’s review of the revalidation request. The MSC initially proposes a three (3) working-day period, subject to confirmation and any adjustments suggested by the Market Operator based on its business processes.	<u>MSC:</u> 17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the Market Operator. <u>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report</u>	<u>For MSC:</u> We defer the proposal on MO’s timeline for review to MO.	

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						<p><u>these to the Market Operator within three (3) working days from the receipt of the report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported discrepancies within three (3) working days from the receipt of the revalidation request. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>If the Market Operator has not received any validation within the prescribed timeline, the Market Operator shall consider the submitted discrepancies by the Generator as valid.</p>		
					IEMOP:	IEMOP:	For IEMOP:	

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Decision
					<p>Same comment as (1) to (3) above.</p> <p>In addition, to be consistent with Section 14.4.9, in the event that the System Operator fails to provide the validation within the prescribed timeline, it is recommended the data from the DIR shall be maintained. Similarly, it is recommended that the data from the initial validation report shall be maintained in case the System Operator fails to provide the results of its revalidation within the prescribed timeline.</p>	<p>17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the Market Operator.</p> <p><u>If the Market Operator has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained.</u></p> <p><u>If the Trading Participants find any further discrepancies in the submitted report, the Generator Company must report these to the Market Operator within three (3) working days from its receipt of the validation report. The Market Operator shall review the revalidation request, and if deemed to be with merit, shall then request the System Operator to re-validate the reported</u></p>	<p>(1) MO should review the DIR Discrepancy Claims for both form and substance. For example, on June 20, 2023, we received a CSV file from MO containing 30,240 records (intervals) of DIR discrepancy claim filed SPC. SPC claimed for MRU despite being scheduled as AS and even during intervals when it is not running.</p> <p>(2) We defer the proposal on MO's timeline for review to PEMC-RCC.</p> <p>(3) We defer the proposal to PEMC-RCC.</p>	

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WESM Manual on Dispatch Protocol Issue 22.1								
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent's Response	RCC Decision
						<p><u>discrepancies. Within two (2) working days from receipt of such report from the Generator Company, the Market Operator shall then request the System Operator to re-validate the reported discrepancies. The System Operator shall then provide the results of its re-validation within seven (7) working days from receiving the request from the Market Operator.</u></p> <p>If the Market Operator has not received any validation <u>revalidation</u> within the prescribed timeline, the Market Operator shall consider the submitted discrepancies by the Generator as valid. the <u>data from the initial validation report shall be maintained.</u></p>		
						<p><u>TC:</u></p> <p>In addition to the comments, suggest adding "from the System Operator" to</p>	<p><u>For TC:</u></p> <p>We defer this comment to the PEMC-RCC.</p>	

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Re-wording based on Comments	Proponent’s Response	RCC Decision
						improve clarity as follows: 17.5.3 The System Operator shall provide the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the Market Operator. If the Market Operator has not received any validation within the prescribed timeline <u>from the System Operator</u> , the Market Operator shall consider the submitted discrepancies by the Generator as valid.		



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Annex C – Presentation Material of the Proposed Amendment on WESM Penalty Manual Rules Change Procedure and Other Enhancement to MSC Processes



PROPOSED AMENDMENTS ON WPM RULES CHANGE PROCEDURE AND OTHER ENHANCEMENT TO MSC PROCESSES

MSC Presentation to the RCC

20 June 2025

THE PROPONENT

- The proponent is the PEMC – Market Surveillance Committee (MSC), composed of five (5) members who are appointed by the PEM Board and mandated, among others, to:
 1. monitor the activities of WESM participants and submit corresponding market and committee reports, and
 2. review and propose amendments, as appropriate, to the WESM Penalty Manual.



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PENALTY-RELATED PROVISIONS ON MANDATE OF MSC

WESM Rules

Clause 7.2.5.5.

The MSC shall review the WESM Penalty Manual from time to time as may be necessary, and in consultation with the RCC, CC and the PEM Board, recommend changes thereto, provided, that changes on the same shall be subject to the approval of the DOE.

Market Surveillance Manual 1.0

Section 3.1 (g)

Annually review and propose changes, as appropriate, to the WESM Penalty Manual pursuant to Clause 7.2 of the WESM Rules.

WESM Penalty Manual 3.0

Section 3.3.

The MSC shall annually review the levels and range of penalties as set out in this Manual. From time to time and as may be necessary, the MSC shall submit to the DOE its proposed amendments thereto, in consultation with the WESM Members, RCC and the PEM Board.

Section 7.1.1.

Amendments to this Manual may be initiated by the MSC, the CC, the ECO, the MO, the SO or any other WESM Member. Amendments initiated by parties other than the MSC shall be done by submitting formal proposals for amendment to the MSC.

Section 7.1.3.

The MSC shall conduct consultations on the proposed changes with the WESM Members, RCC and the PEM Board, in accordance with the WESM Rules.

Section 7.1.4.

Amendments to this Manual shall be approved and promulgated by the DOE.

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ACTION REQUESTED

- PEMC – MSC is requesting for the amendments of the following:
 - WESM Rules
 - Market Surveillance Manual
- For information of the RCC – the corresponding proposed amendments to the WESM Penalty Manual

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RATIONALE OF THE PROPOSAL

- On the Clarification of MSC’s procedure for review of Rules Changes to Penalty Manual:
 - While the WESM Penalty Manual provides guidance on the process that each proposed amendment undergoes—from deliberation to the commenting of various entities required by the WESM Rules, including WESM Members—clear procedures to be followed by the proponent and even the Market Surveillance Committee (MSC) in the performance of its mandate are yet to be established.
- On other enhancement of MSC processes
 - Given the evolving nature and needs of the WESM and the Retail Market, and the continuous learning that comes from the operations and experiences of the Committee, the enhancements and clarifications to its procedures and its outputs are necessary

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SUMMARY OF THE CHANGES




Clarification of MSC’s procedure for review of Rules Changes to Penalty Manual

- To provide a clear and detailed framework for the MSC regarding its responsibilities and procedures for reviewing and approving any proposed changes to the WESM Penalty Manual or Penalty Provisions.
- To ensure that the MSC effectively oversees the integrity and proper functioning of the electricity market.

Proposed Changes:

- Inclusion of provisions in the WESM Rules, and Market Surveillance Manual to clarify the responsibility / mandate of the MSC to process the proposed amendments relative to WESM Penalty Provisions.
- Inclusion of provisions in the Market Surveillance Manual and WESM Penalty Manual for the procedures to follow for the processing of proposed amendments.
- Revisions to WESM Rules to include MSC in the scope of Chapter 8 – Rules Changes.




Enhancement of MSC procedures and processes

- To enhance and clarify the procedures and processes of the MSC to ensure its effective operation and strengthen its oversight capabilities.
- To streamline operations, clarify responsibilities, and align with current structure and procedures.

Proposed Changes:

- Shift from monthly to quarterly assessment report to avoid redundancy in the reports as well as enhance the depth and accuracy of market assessments (monthly statistics will still be regularly issued).
- Harmonization for the names of the reports being submitted and the streamlining of the document submission process to various entities
- Removal of the Enforcement and Compliance Office from the MSC’s direct reporting lines due to its realignment under the Compliance Committee.



Other minor edits for clarity / brevity

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RULES CHANGE PROCESS



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