



## MEETING MINUTES

Subject/Purpose : 250<sup>th</sup> RCC (Regular) Meeting  
 Date & Time : 19 September 2025, 9:00 AM to 3:00 PM  
 Venue : Online via Microsoft Teams  
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### ATTENDEES

|     | Name                       | Designation/Position                                                            | Department/<br>Company |
|-----|----------------------------|---------------------------------------------------------------------------------|------------------------|
| 1.  | Rachel Angela P. Anosan    | Chairman, Independent                                                           | RCC                    |
| 2.  | Jesusito G. Morillos       | 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.  | Michelle S. Tuazon         | Member (Alternate), Generation Sector                                           | RCC                    |
| 9.  | Ryan S. Morales            | Member (Principal), Distribution Sector                                         | RCC                    |
| 10. | Russel S. Alabado          | Member (Principal), Distribution Sector                                         | RCC                    |
| 11. | Alfredo C. Sanaga, Jr.     | Member (Alternate), Distribution Sector                                         | RCC                    |
| 12. | Nelson M. Dela Cruz        | Member (Principal), Distribution Sector                                         | RCC                    |
| 13. | Darryl Lon A. Ortiz        | Member (Principal), Transmission Sector                                         | RCC                    |
| 14. | Gian Karla C. Gutierrez    | Member (Principal), Supply Sector                                               | RCC                    |
| 15. | Bryan Alvin A. Calasanz    | Member (Alternate), Supply Sector                                               | RCC                    |
| 16. | Kristoffer Monico S. Ng    | Member (Principal), Market Operator                                             | RCC                    |
| 17. | Lilibeth Grace L. Vetus    | Member (Alternate), Market Operator                                             | RCC                    |
| 18. | Jane May M. Mea            | DOE Observer                                                                    | DOE                    |
| 19. | John Paulo O. Castro       | DOE Observer                                                                    | DOE                    |
| 20. | Karen A. Varquez           | Secretariat                                                                     | PEMC                   |
| 21. | Karlo D. Martin            | 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) / Market Surveillance Committee (MSC) Secretariat | PEMC                   |
| 25. | Ira Lee P. Corectico       | MAG / MSC Secretariat                                                           | PEMC                   |
| 26. | John Eisendel M. Labay     | MAG / MSC Secretariat                                                           | PEMC                   |
| 27. | Hilary Romeli C. Florendo  | Enforcement and Compliance Office (ECO)                                         | PEMC                   |
| 28. | Andrea J. Mendiola         | Chief Legal Officer                                                             | PEMC                   |
| 29. | Earl James G. Reyes        | Legal                                                                           | PEMC                   |
| 30. | Gabriel R. Marmeto         | Legal                                                                           | PEMC                   |
| 31. | Joshua Joy F. Co           | Legal                                                                           | PEMC                   |
| 32. | Cedric Xian Mico L. Uy     | Office of the President – WESM Governance Office (OP-WGO)                       | PEMC                   |



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|     | Name                        | Designation/Position                                            | Department/Company |
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| 33. | Ermelindo R. Bugaoisan, Jr. | Proponent – National Grid Corporation of the Philippines (NGCP) | NGCP               |
| 34. | Christian J. Del Rosario    | Proponent                                                       | NGCP               |
| 35. | Joselito C. Quilala         | Proponent                                                       | NGCP               |
| 36. | Pamela Domenique M. Dizon   | Proponent                                                       | NGCP               |
| 37. | Jose Roderick F. Fernando   | Proponent – MSC Member                                          | MSC                |

### 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 thirteen (13) principal members, and four (4) alternate members present.

Two (2) observers from the DOE were present.

### 3.0 Adoption of Agenda

Ms. Karen A. Varquez (Secretariat) presented the revised proposed agenda that was sent to the RCC on 16 September 2025. Revisions are as follows:

1. Added Agenda 5.2 on the deliberation and approval of the Proposed General Amendments to the WESM Rules and WESM Manual on Market Surveillance regarding Market Surveillance Committee Processes; and
  2. Added Agenda 5.3 on the approval of the request for extension of the Proposed Urgent Amendments to WESM Manual on Dispatch Protocol on the Issuance and Coverage of Dispatch Schedule below Minimum Stable Load
  3. Additional schedules for information under Agenda 6.3 on RCC Meeting and WCO Summit 2025.
- ✓ The RCC approved the request made by the MSC to move Agenda Item 5.2 to the afternoon session at 1:00 PM for discussion and deliberation.
  - ✓ The RCC approved the revised proposed agenda, as presented.

### 4.0 Draft Minutes of Previous Meetings

Ms. Varquez presented the draft minutes of 249<sup>th</sup> RCC (Regular) Meeting held on 15 August 2025, highlighting that the comments received from the Market Operator have already been incorporated in the draft minutes.

- ✓ The RCC approved the draft minutes of 249<sup>th</sup> RCC (Regular) Meeting.
- ✓ The Secretariat shall route the minutes for RCC's signature via Adobe Sign.

### 5.0 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

- Presenter/s: Ms. Mary Rose L. Bisnar
- Action Requested: For deliberation and approval
- Material/s: Annex A – Presentation Material of 250<sup>th</sup> RCC (Regular) Meeting  
 Annex B – Matrix of the Proposed Revision to the Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancies in Dispatch Instruction Report

#### Proceeding/s:

Ms. Bisnar provided a brief recap of the discussions and action items during the 249<sup>th</sup> RCC (Regular) Meeting<sup>1</sup> held on 15 August 2025. She presented the following points of discussion:

1. The System Operator (SO) presented a comparison between the current and proposed validation processes. The RCC discussed whether to introduce a revalidation process or to enhance the existing one.
2. The RCC discussed the possibility of holding a conference between the Market Operator (MO), the System Operator (SO), and the Trading Participant (TP) for reconciliation. However, both the MO and SO indicated that this would be difficult due to the need to coordinate the schedules of the dispatchers.
3. The RCC agreed to exclude the materiality threshold from the proposed criteria. Considering the legal opinion provided by PEMC, it was noted that the current rules and manuals do not impose revalidation fees. Therefore, introducing such a fee would require the approval of both the DOE and the ERC.

During the same meeting, the RCC voted on the proposal for an additional validation process. Thirteen (13) out of fifteen (15) members voted in favor<sup>2</sup> of the proposal.

Ms. Bisnar presented a summary of the proposed revisions to the WESM Market Manuals, specifically affecting the Dispatch Protocol Manual Issue 23.1, including Section 14.4 (Post Dispatch Reports and Information) and Section 17.5 (Reporting and Publication of Must-Run Units), which the RCC Secretariat prepared, in coordination with SO and MO<sup>3</sup>, and submitted to the RCC on 16 September 2025 for review.

Ms. Bisnar then presented the Matrix of Proposed Amendments (Annex B) line by line, covering both the Original Proposed Amendments and the Revised Proposed Amendments. She began with the introduction of a new Section 14.5, titled "Reporting and Publication," which proposes to outline the publication of post-dispatch data and operation reports, as well as the procedure for reporting discrepancies in these reports. She also noted that the subsequent provisions would be renumbered accordingly. Further, she mentioned that the process is proposed to be broken down into sub-sections for initial validation requests (Sections 14.5.2 to 14.5.4) and for revalidation requests (Sections 14.5.5 to 14.5.8). She also highlighted the proposed addition of Section 14.5.9,

<sup>1</sup> Minutes of Meeting 249<sup>th</sup> RCC (Regular) Meeting

<sup>2</sup> Alabado, Andal, Anosan, Banzon, Claudio, Dela Cruz, Francisco, Fortich, Gutierrez, Morallos, Morales, Ortiz, Tuazon

<sup>3</sup> The revised proposed amendments were provided to the SO and the MO for comments on 12 September 2025 and 15 September 2025, respectively. The SO submitted its comments on 18 September 2025.



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which outlines the criteria for both initial validation and revalidation, and the proposed revisions to Section 17.5, explaining that these sections will now be aligned with Section 14.5. Provided below are the RCC's deliberations per topic:

### **Proposed new Section 14.5 (Reporting and Publication)**

- The body approved the first item regarding the creation of the new Section 14.5 for Reporting and Publication.

### **Proposed sub-sections 14.5.2 to 14.5.4 on Initial Validation**

- For Section 14.5.2, Ms. Rachel Angela P. Anosan (RCC-Independent) suggested including the enumeration of the criteria for both initial validation within this section, rather than creating a separate section for the criteria.

Mr. Kristoffer Monico S. Ng (RCC-Market Operator) added that the provision should specify the consequences of non-compliance with the criteria and suggested that it would be more prudent if this provision is clearly expressed.

Ms. Anosan acknowledged Mr. Ng's suggestion and proposed rewording the provision in Section 14.5.2. She explained that the inclusion of the criteria is intended to clarify that what makes the reported discrepancy valid is not just the submission of the report within the required period, but also compliance with the criteria which include timeliness, the requirements for supporting data, and coverage.

- Mr. Darryl Lon A. Ortiz (RCC-System Operator) asked whether there is an existing template for the data exchange between the MO and the TP, or if a new template needs to be created. Mr. Ng responded that there is a format currently being followed. By practice, when a Generation Company submits data using the prescribed template, the MO adjusts the template internally before sending it to the SO. Mr. Ortiz then suggested that a certification on the veracity of the submitted documents be included in the template submitted to the MO. Ms. Anosan agreed to include this as one of the criteria, noting that it would be discussed further when the proposed provision on the criteria is addressed.
- Mr. Ermelindo R. Bugaoisan, Jr. (Proponent-NGCP) highlighted that, in Section 14.5.4, the clause "The System Operator shall perform reconciliation with the Generation Company..." is not included in the process as discussed and approved during the last meeting. He suggested changing the word "reconciliation" to "validate" or "review," since the SO is only basing its actions on the submitted request and data that should be validated, and does not have the authority to discuss matters directly with the Generation Company. Ms. Anosan acknowledged the SO's suggestion to change the word "reconciliation" to "validate".
- Mr. Bugaoisan raised a concern regarding a scenario where a generator submits its request to the MO within the prescribed period, and the MO is expected to forward the report to the SO within two days, as proposed. He pointed out the potential issue if the MO fails to meet this deadline and emphasized the need to clarify the implications for the MO's responsibility in such cases.



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Ms. Anosan responded that this scenario had not yet been discussed. However, she noted that the assumption was that the MO would simply forward the report and requested the RCC's opinion on the matter. She then suggested that any accountability related to the MO's performance and its consequences should be addressed operationally, rather than being explicitly stated in the provision. She emphasized that the process would continue regardless.

Mr. Bugaoisan clarified that the SO's reckoning date would be based on the receipt of the request from the MO. Ms. Anosan agreed and added that any delays on the part of the MO in forwarding the reported discrepancy should not jeopardize the reporting Generator.

### **Proposed sub-sections 14.5.5 to 14.5.8 on Second Validation**

- Mr. Ng sought clarification on Section 14.5.7, on what data should be considered final when there is a valid request for revalidation and the SO fails to return the results within the prescribed seven (7) days.

Mr. Bugaoisan responded that, based on the original version, there is a provision stating that if the SO does not respond within seven days, the data is deemed valid. Mr. Ng acknowledged the response but sought further clarity. He explained that in this section, a validation has already occurred, but there is another set of reports that differ from the Dispatch Instruction Report (DIR). He also asked on which data would prevail, the original DIR or the revised report, if a request for revalidation is made and the SO does not respond within the prescribed timeline.

Ms. Anosan clarified that since this section pertains to revalidation, the revised report would be considered final, not the original DIR. Mr. Ng confirmed his understanding and accepted the clarification.

### **MO's Publication of the DIR and revisions thereto**

- Ms. Varquez raised a question seeking clarification on the current publication process, where the MO only publishes the results of the SO's validation for the affected interval, and not the revised DIR. Considering the direction of the revised proposed amendments, she noted that the current process may need to be updated, particularly in cases where there are revisions to the data under the DIR.

Ms. Anosan responded that the wording of the provisions would be refined to reflect this. She then explained the process wherein the first step will be issuance of the report from the initial validation, followed by a report identifying discrepancies, then, a revised report is produced. If a revalidation request is made and no response is received, the first report would be considered final. She added that the naming conventions for the reports would also be reviewed to ensure clarity.

Mr. Bugaoisan then sought clarification on Section 14.5.7 on whether the revalidated version of the original report is the version to be published. Ms. Anosan confirmed that the published report refers to the revalidation results. Mr. Bugaoisan acknowledged this as the SO revalidated report but pointed out that the second sentence of the provision could be confusing, as it might be mistaken for the initial validation. Ms. Anosan responded that the wording of the provision would need to be reviewed for clarity. Mr. Bugaoisan then suggested



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that the term “revalidation” be explicitly used for the second round, instead of simply “validation,” to avoid ambiguity.

Mr. Ng noted that the second sentence on Section 14.5.7 was originally intended as a continuation of the first. However, due to multiple insertions in the revised proposed amendments, the flow of the provision was disrupted. He cautioned that rewording it might risk omitting the rule altogether.

Ms. Anosan proposed that the provision would be put into under the two sections, including 14.5.2 and 14.5.5, to ensure consistency in the process, including the timeline, criteria, and consequences. Mr. Ng agreed with this approach.

- Ms. Varquez also sought clarification from the MO on whether they intend to publish the first validation report under Section 14.5.2. She understood that the process involves conducting the initial validation, followed by the revalidation, before the MO publishes the reports.

Mr. Ng responded that they would need to consult their process owner, as there are several timelines that must be complied with. He committed to confirming whether this approach is feasible and clarified that while informing the generator is feasible, the publication of the report still requires confirmation.

Concluding the deliberation, Ms. Anosan asked the body if there were any additional comments and consulted the MO and SO regarding the rewording and reformatting of the provisions. Mr. Bugaoisan from the SO and Mr. Ng from the MO confirmed the revised provisions. As no additional comments were raised, she proceeded to call for a vote to approve the revised proposed amendments.

### Agreement/s:

- ✓ The RCC approved the revised proposal, subject to the following revisions:
  1. Delete the proposed Section 14.5.9 which originally provided the criteria for initial and revalidation requests;
  2. Insert (from Section 14.5.9) the proposed criteria into Section 14.5.2 for initial request for validation and into Section 14.5.5 for the revalidation request;
  3. Add a requirement for Certification on the veracity of the documents/information submitted as part of the criteria under Section 14.5.2; and
  4. Reword Section 14.5.4 to state that the SO shall validate the reported discrepancy, instead of verifying it with the Generation Company.
- ✓ The Secretariat shall finalize the revised proposal and submit it to the Chairperson, and then to the RCC for review and final approval via email.
- ✓ Once finalized, the Secretariat shall also prepare the RCC resolution and circulate it for review and final approval.

### 5.2 Proposed General Amendments to the WESM Rules and WESM Manual on Market Surveillance regarding Market Surveillance Committee (MSC) Processes

- Presenter/s: Ms. Ira Lee P. Corectico (MSC Secretariat)



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- Action Requested: For deliberation
- Material/s: Annex C – Matrix on the Consolidated Comments to the Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Market Surveillance Committee Processes  
 Annex D – Matrix on the Proposed General Amendments to the WESM Penalty Manual on Penalty-related Rules Change Processes

### Proceedings/s:

Following the conclusion of the commenting period of the proposal on 05 August 2025, Ms. Varquez informed the body that the MSC had submitted its responses to the comments<sup>4</sup> on the proposal on 16 September 2025.

Ms. Ira Lee P. Corectico (MSC Secretariat) presented the Matrix of comments and corresponding MSC's responses for deliberation of the RCC. Provided below are the RCC's deliberations per topic:

### **MSC's authority to review and propose amendments to WESM Penalty Manual**

- Mr. Ortiz clarified the context of DOE Department Circular DOE DC2006-11-0013<sup>5</sup>, specifically its provision granting the MSC the authority to amend the WESM Penalty Manual. He raised a concern about whether this authority was affected by the reorganization of PEMC as the WESM Governance Arm. He also clarified whether the MSC's authority is limited only to determining the level of penalties.

Ms. Anosan agreed with the clarification but noted the need to further review subsequent amendments to the WESM Penalty Manual, particularly regarding the scope of the MSC's authority.

Mr. Aldjon Kenneth M. Yap (MSC Secretariat) presented the latest version of the WESM Rules, specifically highlighting Section 7.2.5.5, which supports the authority of the MSC to review the WESM Penalty Manual in consultation with the Rules Change Committee, Compliance Committee, and the PEM Board.

Ms. Pamela Dominique M. Dizon (NGCP) sought clarification on Section 7.2.5.5, stating that the MSC can only recommend changes to the WESM Penalty Manual and cannot independently introduce new bases for penalties. She emphasized that any penalty must be implemented by the PEM Board, and the MSC's role remains recommendatory. She added that if there is a valid basis for the MSC's input to the Penalty Manual, it would be accepted (by the PEM Board).

Mr. Yap agreed with Ms. Dizon's point that the MSC's role is recommendatory and highlighted that the MSC is responsible for processing amendments and reviewing the manual, as provided in the WESM Penalty Manual (Section 7). He acknowledged the scope of the MSC's responsibilities, which include reviewing and processing proposed amendments to the WESM Penalty Manual. He clarified that while the MSC drafts, reviews, and finalizes proposals, it

<sup>4</sup> from Aboitiz Power Corporation (APC), Millenium Energy Inc., Panasia Energy Inc. (MEI/PEI) and National Grid Corporation of the Philippines (NGCP)

<sup>5</sup> DOE DC2006-11-0013



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must consult the RCC, Compliance Committee, and PEM Board. As an independent surveillance body, the MSC will recommend the finalized Penalty Manual to the DOE. He also noted that the current proposal focuses on how the MSC would implement this process.

- Mr. Ortiz again sought clarification on the process concerning the MSC's authority to propose amendments and endorse them directly to the DOE, specifically in relation to the WESM Penalty Manual. He then asked for confirmation regarding the current proposal, which pertains to amendments to the WESM Rules and the Market Surveillance Manual, and noted that the claim of MSC being authorized to propose amendments directly to the DOE has not yet been implemented, as proposals are still coursed through the RCC.

Ms. Anosan responded that the MSC only presented proposed amendments to the WESM Rules and the Market Surveillance Manual, which are for consideration, and clarified that these do not include amendments to the Penalty Manual.

- Mr. Jordan Rel C. Orillaza (RCC-Independent) asked for clarification regarding the proposed amendments to WESM Rules Section 8.4.7, specifically on the authority of the MSC to submit proposed amendments to the Penalty Manual directly to the DOE. He then asked for confirmation if this was indeed the intended process once the proposal is approved. Additionally, he inquired whether there was an urgency that warranted direct submission to the DOE, bypassing the usual endorsement process (via the PEM Board).

Mr. Jose Roderick F. Fernando (MSC-Proponent) reiterated that the MSC's proposal is limited to the harmonization of provisions. He clarified that the matter involves a governance issue, as it pertains to the imposition of penalties on market participants. In such cases, consultation with RCC, Compliance Committee, and the PEM Board is necessary. He noted that it is acceptable for Independent Members to impose penalties rather than the PEM Board, as this avoids the perception of self-regulation. He further emphasized that, based on the WESM Rules, it is clearly stated that the process involves consultation with the PEM Board, not direct imposition.

Mr. Yap clarified that the provision in question already encompasses the entire process, including submission to the DOE. He noted that this section represents the stage where consultation with the RCC, Compliance Committee, and PEM Board has already been completed. He also highlighted the distinction between the MSC and the RCC where the MSC submits proposed amendments directly to the DOE, specifically those related to the Penalty Manual, while the RCC endorses proposed amendments to the PEM Board for other Market Rules and Manuals.

Mr. Orillaza acknowledged that the proposed amendment is not objectionable. He then asked for clarification on how the consultation with the PEM Board is conducted as part of the process.

Mr. Yap responded that, in previous instances, proposals to amend the Penalty Manual were always accompanied by related rule changes to other Market Manuals. He explained that the MSC consistently coordinated with the RCC, and that RCC deliberations served as the MSC's consultation process, which include engagement with WESM Members.



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Following deliberations at the RCC level, the proposals were endorsed and presented to the PEM Board, where the proposed amendments to the Penalty Manual were also presented for comments. The latter was then finalized by the MSC through a resolution and the proposals were submitted jointly to the DOE.

He also noted that there has not yet been an instance where a proposal to amend only the Penalty Manual was submitted. If such a case arises, the MSC would conduct the consultation directly with the PEM Board.

Mr. Orillaza acknowledged the response.

### **MSC's responsibility on the issuance of notification of possible anti-competitive behavior**

- Mr. Carlito C. Claudio (RCC-Generator) sought confirmation on whether the notice of possible commission of anti-competitive behavior is submitted to the PEMC President and/or the WESM Governance Officer for approval. He also sought clarification on who is responsible for endorsing the notice to the ERC.

Ms. Corectico responded that if the MSC determines the possibility of anti-competitive behavior, it will recommend the issuance of a notice to the ERC. She further clarified that the PEMC President is responsible for the endorsement and cited Section 4.4 of the Market Surveillance Manual, which pertains to the issuance of a notification of possible anti-competitive behavior.

Mr. Claudio acknowledged the existence of a specific provision and asked for confirmation on whether there is no need to include this detail in the proposed amendments.

Ms. Corectico explained that Section 3.1 focuses on the responsibility of the MSC, while Section 4.4 provides details regarding anti-competitive behavior and the MSC's recommendation to the PEMC President for the issuance of a notice.

Mr. Claudio further clarified that the MSC's responsibility also includes endorsing the notice to the ERC. Ms. Corectico reiterated that the endorsement is the responsibility of the PEMC President. Mr. Claudio then confirmed that the PEMC President endorses the notice upon the recommendation of the MSC.

Ms. Corectico also presented the Matrix on the Proposed General Amendments to the WESM Penalty Manual (Annex D) for the RCC's comments. She highlighted that the step-by-step process for handling the proposed amendment is reflected in the proposed amendments to the WESM Market Surveillance Manual and WESM Rules.

#### Agreement/s:

- ✓ The RCC will continue its deliberation on the proposal during its next RCC Meeting on 17 October 2025.
- ✓ Any comments on the proposed amendments to WESM Penalty Manual of the RCC shall be aligned to the results of said deliberation and will be provided to the MSC.

### 5.3 Proposed Urgent Amendments to WESM Manual on Dispatch Protocol on the Issuance and Coverage of Dispatch Schedule below Minimum Stable Load



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- Presenter/s: Ms. Karen A. Varquez (Secretariat)
- Action Requested: For approval
- Material/s: Annex E – Draft RCC Resolution on the Request for Extension of the Effectivity of Urgent Amendments to the WESM Manual on Dispatch Protocol on Issuance and Coverage of Dispatch Schedule below Minimum Stable Load (Pmin)

### Proceedings/s:

Ms. Varquez presented the background of the proposal and its timeline. She noted that the proposal was approved on 25 October 2024, with an initial effectivity period of six (6) months. In March 2025, the RCC requested the first extension of the amendment. Alongside this request, the RCC also endorsed the corresponding General Amendment for approval, which is currently undergoing public consultation with the DOE.

Ms. Varquez emphasized that the current extension will expire on 25 October 2025, necessitating another extension. She also mentioned that the RCC Resolution for the extension was already presented by Ms. Anosan during the Board Review Committee (BRC) Meeting on 16 September 2025 and is scheduled to be presented to the PEM Board on 24 September 2025.

The proposed extension is for another six (6) months, covering the period from 25 October 2025 to 25 April 2026, or until the DOE approves the corresponding General Amendments endorsed under PEM Board Resolution No. 2025-82-03, whichever comes first.

Ms. Varquez also presented the draft RCC Resolution No. 2025-03, which was circulated to the RCC via email on 17 September 2025.

### Agreement/s:

- ✓ The RCC approved the request for extension of effectivity of the urgent proposal and the corresponding RCC Resolution No. 2025-03.
- ✓ The Secretariat shall finalize and route the resolution for RCC's signature via Adobe Sign.

## 6.0 Other Matters

### 6.1 Update on Proposed Amendments

- Presenter/s: Ms. Karen A. Varquez (Secretariat)
- Action Requested: For information
- Material/s: Annex A – Presentation Material of the 250<sup>th</sup> RCC (Regular) Meeting

### Proceeding/s:

Ms. Varquez presented the updates on the rules change proposals, as follows:

| Status                                                            | Topic                                           |
|-------------------------------------------------------------------|-------------------------------------------------|
| Urgent Amendment Approved by the PEM Board/Ongoing Implementation | 1. Dispatch Schedules below Minimum Stable Load |

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|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                           | 2. Further revision to Urgent Amendment on the Ancillary Services Monitoring Manual                                                                                                                                               |
| General Amendments under RCC Evaluation of Finalization   | 1. Validation Process of Reported Discrepancies in the Dispatch Instruction Report (DIR)<br>2. Market Surveillance Committee Processes                                                                                            |
| General Amendments published for comments in PEMC Website | 1. Harmonization of Market Rules and Manuals with ERC Resolution No. 13, Series of 2024<br>2. Option to use the Final Metered Quantity as Final Bilateral Contract Quantity                                                       |
| Deferred Proposals                                        | 1. Energy Storage System (ESS)<br>2. Must-Offer Rule (MOR)                                                                                                                                                                        |
| Approved Proposal by the DOE                              | 1. Interruptible Load Program – approved per DOE DC2025-08-0011 effective on 31 August 2025.                                                                                                                                      |
| Proposed Amendment's awaiting DOE's Approval              | 1. Rules Change Process<br>2. Dispatch Schedules below Minimum Stable Load<br>3. Reserve Conformance Standards and Related Enforcement Actions (Further revision to Urgent Amendment on the Ancillary Services Monitoring Manual) |

Ms. Varquez also provided further updates on the following proposals:

1. Energy Storage System (Proponent: IEMOP)
  - As per the Energy Regulatory Commission (ERC), they have expressed that their current priority is the revision of the Grid Code. Once this is completed, they will proceed to address issuances related to Energy Storage Systems.
2. Must-Offer Rule (Proponent: GNPk)
  - On 16 September 2025, GNPk (Proponent) submitted a letter to the RCC providing an update on its consultation with DOE.
  - In the same letter, GNPk is requesting the RCC to archive the proposal and await the results of said consultation.
3. Interruptible Load Program (Proponent: IEMOP)
  - Approved per DOE DC2025-08-0011 effective on 31 August 2025.

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- The changes made by the DOE to the PEMC endorsed proposal are summarized as follows:

| WESM Rules and Manuals                           | Updates                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WESM Rules                                       | <ul style="list-style-type: none"><li>○ Addition of word “intend” in the clause 3.13.1.3</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| WESM Manual on Billing and Settlement Issue 16.0 | <ul style="list-style-type: none"><li>○ Section 9.5.2: deleted the reference to Sections 9.5.1 (a) and 9.5.1 (b)</li><li>○ Section 9.5.5:<ul style="list-style-type: none"><li>▪ Transferred the additional requirement for re-declaration (i.e. to be submitted only once) to Section 9.5.6 (new Section from DOE)</li><li>▪ Incorporated the condition for Directly Connected Customers (from Section 9.5.6)</li></ul></li><li>○ Section 9.5.6:<ul style="list-style-type: none"><li>▪ Proposed wordings were combined with Section 9.5.5</li><li>▪ Combined the conditions from Section 9.5.8 and Section 9.5.9 and Renumbered to Section 9.5.6</li><li>▪ Deleted the last three portions of the provision<ul style="list-style-type: none"><li>• For avoidance of doubt – already indicated that Generation Company shall be allowed only once</li><li>• Further any correction – DOE added in the provision the deadline of submission</li><li>• The Market Operator shall notify – already incorporated in Section 9.5.7</li></ul></li></ul></li><li>○ Section 9.5.7:<ul style="list-style-type: none"><li>▪ Change from seven (7) business days deadline of re-declaration to ten (10) business days (in relation to the added DOE condition on 9.5.6: additional three (3) days)</li><li>▪ Other edits on the latter part of the provisions</li></ul></li></ul> |

4. Non-security Overriding Constraints
- On 09 September 2025, NPC (Proponent) provided updates, which include a series of discussions and coordination with the DOE, NPC, and PSALM regarding the proposal and related issues concerning CBK HEPP. NPC informed the RCC that it has deferred further action until the completion of the CBK HEPP privatization and will be working with the concerned parties.

Agreement/s:

- ✓ The RCC noted the updates on the rules change proposals and agreed to archive the Must-Offer Rule proposal while awaiting the results of GNPK’s consultation with the DOE.



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### 6.2 DOE Updates

- Presenter/s: Ms. Karen A. Varquez (Secretariat)
- Action Requested: For information
- Material/s: N/A

Proceeding/s:

Per prior communication with the DOE, there are no updates as of this meeting.

### 6.3 Schedule of Activities

- Presenter/s: Ms. Karen A. Varquez (Secretariat)
- Action Requested: For Information
- Material/s: Annex A – Presentation Material of the 250<sup>th</sup> RCC (Regular) Meeting

Proceeding/s:

Ms. Varquez presented the following schedule of activities, for RCC's information:

| Meetings          | Schedule                     |
|-------------------|------------------------------|
| RCC Meeting       | 17 October 2025              |
|                   | 21 November 2025             |
|                   | 12 December 2025 (In Person) |
| BRC Meeting       | 16 September 2025            |
| PEM Board Meeting | 24 September 2025            |

Agreement/s:

- ✓ The RCC noted the schedule of activities and confirmed the proposed in-person meeting on 12 December 2025.

## 7.0 Adjournment

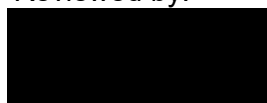
The meeting was adjourned at 2:38 PM.

Prepared by:



KARL D. MARTIN  
 Rules Review Manager  
 Market Assessment Group

Reviewed by:



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

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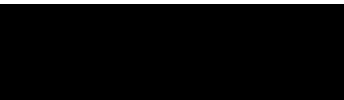


Noted by:



BIENVENIDO C. MENDOZA, JR.  
Chief Market Assessment Officer

Approved by:



RACHEL ANGELA P. ANOSAN  
Chairperson, Independent



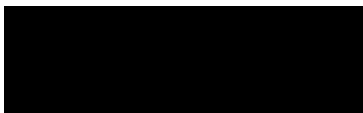
JESUSITO G. MORALLOS  
Member, Independent



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 Corporation (APC)



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

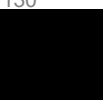


Attended by Ms. MICHELLE S. TUAZON  
MARK D. HABANA  
Member, Generation Sector  
Vivant Corporation – Philippines (Vivant)



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

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



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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)



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



KRISTOFFER MONICO S. NG  
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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### DATA PRIVACY NOTICE

PLEASE BE INFORMED THAT THE **250<sup>TH</sup> 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](mailto:MAG_RRD@WESM.PH) AND/OR THE DPO AT [DPO@WESM.PH](mailto:DPO@WESM.PH)

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**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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**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.**

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**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.**

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# CALL TO ORDER



# DETERMINATION OF QUORUM





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### DETERMINATION OF QUORUM

| Representation/<br>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           | Kristoffer Monico S. Ng             | Lilibeth Grace L. Vetus-Magtalas |            |  |



## 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"> <li>249<sup>th</sup> RCC (Regular) Meeting, 15 August 2025</li> </ul>                                                                                                                                                                                                                                | 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"> <li>Summary of the previous discussion</li> <li>Presentation of the revised proposal</li> </ul>                                                                                 | Secretariat/Proponent (NGCP)                                    | For Deliberation and Approval                         |
| 5.2. Proposed General Amendments to the WESM Rules and WESM Manual on Market Surveillance regarding Market Surveillance Committee Processes <ul style="list-style-type: none"> <li>a. Line-by-line deliberation</li> <li>b. For RCC's comments on the Proposed Amendments to the WESM Penalty Manual for the Rules Change Procedures for Penalty-related provisions</li> </ul> | Secretariat/<br>Atty. Jose Roderick Fernando<br>MSC (Proponent) | a. For Deliberation and Approval<br>b. For Discussion |

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### ADOPTION OF THE AGENDA

| Proposed Agenda                                                                                                                                                                                                                                                                                                                                   | Presenter     | Action Required |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------|
| 5.3. Proposed Urgent Amendments to WESM Manual on Dispatch Protocol on the Issuance and Coverage of Dispatch Schedule below Minimum Stable Load <ul style="list-style-type: none"> <li>2nd Extension of Effectivity (25 Oct 2025 to 25 Apr 2026; or until DOE approval of General Amendment)</li> <li>Draft RCC Resolution No. 2025-03</li> </ul> | Secretariat   | For Approval    |
| VI. Other Matters                                                                                                                                                                                                                                                                                                                                 |               |                 |
| 6.1 Update on Proposed Amendments                                                                                                                                                                                                                                                                                                                 | Secretariat   | For information |
| 6.2 DOE Updates                                                                                                                                                                                                                                                                                                                                   | DOE Observers | For information |
| 6.3 Schedule of Activities                                                                                                                                                                                                                                                                                                                        | Secretariat   | For information |
| VII. Adjournment                                                                                                                                                                                                                                                                                                                                  |               |                 |

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### IV. DRAFT MINUTES OF PREVIOUS MEETING

- 249<sup>th</sup> RCC (Regular) Meeting,  
15 August 2025



### V. MATTERS ARISING FROM PREVIOUS MEETING



## MEETING MINUTES

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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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### UPDATES FROM PREVIOUS MEETING

- During the 248<sup>th</sup> RCC (Regular) Meeting, the NGCP/SO presented the proposed criteria for revalidation process implementation. These criteria comprised of the following:
  - 1. Eligibility of Revalidation Requests**
    - Nature and type of discrepancies eligible for revalidation
      - Inconsistencies between dispatch instructions and actual dispatch
      - Data mismatches
    - The range of data submitted for revalidation must be the same as that provided during the initial validation stage. No new data outside the original scope will be considered.
  - 2. Submission of Requirements**
    - Required documentation or evidence to support the revalidation request
      - e.g. logs, screenshots, correspondences, voice recording
    - Format and channel for submission
      - e.g. through IEMOP via email, or IEMOP help desk portal



### UPDATES FROM PREVIOUS MEETING

- 3. Timeliness**
  - Deadline for Generation Companies to the revalidation requests
    - e.g. within 3 working days after receipt of initial validation results
  - Timeline for MO to forward the request to SO and for SO to respond
    - e.g. 3 days for MO, 7 days for SO
- 4. Materiality Threshold**
  - Minimum financial impact required for a request to be considered
    - e.g. deviation must exceed a certain peso value
- 5. Limitations and Expectations**
  - Limit to one (1) revalidation requests per trading week period to avoid abuse.
  - Conditions under which revalidation may be denied
    - e.g. Incomplete documentation, late submission





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### UPDATES FROM PREVIOUS MEETING

- During the meeting, the RCC requested the following:
  - The MO and SO to revisit the entire validation process to review the following:
    - Timeliness
    - Materiality Thresholds
    - Submission requirements
  - SO to prepare a presentation on the entire revised process, incorporating the proposed criteria, submission requirements, and timeliness.
  - PEMC-Legal to provide an opinion on the feasibility of charging revalidation fee.



### LEGAL OPINION

REF NO.: PEMC/LGL.2025/032  
 14 August 2025

#### DISCUSSION

3. The WESM Rules and the Dispatch Protocol Manual do not currently provide for the imposition of a revalidation fee. There is no express prohibition, but also no enabling provision that would allow the SO to charge fees for revalidation services.
4. **Nature of revalidation fee.** The revalidation fee, by nature, is an administrative charge that is collected to defray the costs of additional work due to the revalidation of data. It constitutes a cost-recovery mechanism for additional service that may be deemed beyond the SO's standard obligations. As this would be collected from the relevant market participants, it follows that any fee imposed on generation companies may ultimately be passed on to end-users. This potential pass-through to consumers justifies the need for regulatory oversight.
5. To implement the fee, an amendment to the WESM Rules or relevant Market Manual is necessary, supported by stakeholder consultation and regulatory review. Approval from the **DOE** and/or **ERC** may be required, especially if the fee affects market pricing or consumer costs.

Feasibility of Imposition of Revalidation Fee  
 Template ID: LGL.TMP.06    Version No.: 1.0    Effective Date: 03-Jan-2025    Page 1 of 2





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### UPDATES FROM THE PREVIOUS MEETING

#### 249<sup>th</sup> RCC (Regular) Meeting held 15 August 2025

##### *Proceeding/s:*

- The NGCP/SO presented the proposed validation process for the reported discrepancy in DIR, incorporating the proposed criteria for initial and revalidation process.
  - Point of discussion:
    1. Current Process vs. New Process: The RCC discussed whether to introduce a revalidation process or strengthen the current one.
    2. Reconciliation and Communication: The RCC discussed the idea of a conference between the MO, SO, and TP for reconciliation.
    3. Materiality Threshold and Revalidation Fee: Considering the Legal Opinion, the RCC agreed to exclude the materiality threshold from the proposed criteria.

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### UPDATES FROM THE PREVIOUS MEETING

#### 249<sup>th</sup> RCC (Regular) Meeting held 15 August 2025

##### *Agreement/s:*

- By majority of votes, 13 out of 15 RCC members were in favor of the proposal for an additional revalidation process, while 2 RCC members supported the option to strengthening the implementation of the current validation process.
- The RCC agreed to exclude the Materiality Threshold in the proposed criteria for revalidation process.

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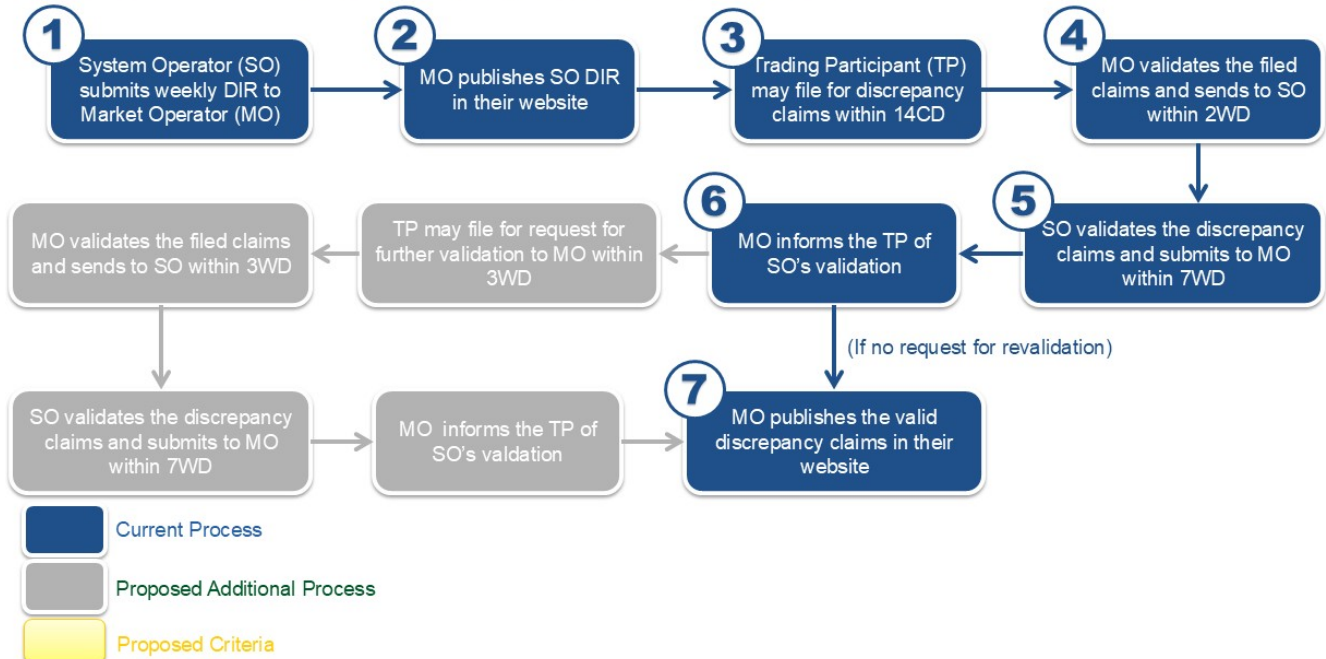
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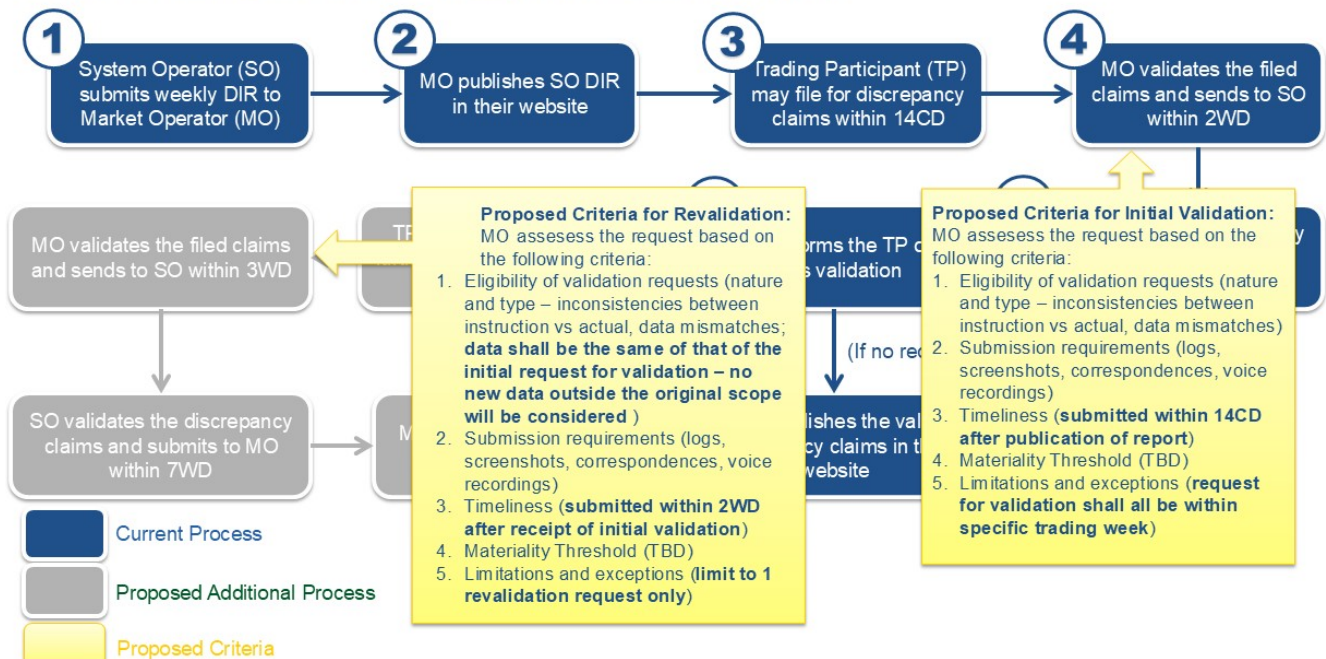
### Annex A – Presentation Materials of 250<sup>th</sup> RCC (Regular) Meeting

#### Proposed Validation Process of Dispatch Instruction Report



Note: This is not the official presentation material. This illustration is taken from the presentation during the 249<sup>th</sup> RCC (Regular) Meeting on 15 August 2025. Official presentation material is being requested from the Proponent.

#### Proposed Validation Process of Dispatch Instruction Report



Note: This is not the official presentation material. This illustration is taken from the presentation during the 249<sup>th</sup> RCC (Regular) Meeting on 15 August 2025. Official presentation material is being requested from the Proponent.



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### PROPOSED REVISION

| Market Documents                                            | Original Proposed Amendment                                                                                                                                                                                                                                                                                           | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WESM DPM Section 14.4 Post Dispatch Reports and Information | <ul style="list-style-type: none"> <li>To include a provision for the revalidation process of data 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</li> </ul>                 | <ul style="list-style-type: none"> <li>To add a section 14.5 that outlines the publication of post-dispatch data and operation reports, as well as the procedure for reporting discrepancies in these reports.</li> <li>To provide criteria for Market Operator's review of the submitted discrepancy report.</li> <li>Re-numbering</li> </ul> |
| WESM DPM Section 17.5 Reporting and Publication             | <ul style="list-style-type: none"> <li>To include a provision for the revalidation process of data related to MRU 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.</li> </ul> | <ul style="list-style-type: none"> <li>To delete sub-sections under Section 17.5 and revise to refer the processing of discrepancy report to the proposed new Section 14.5.</li> </ul>                                                                                                                                                         |

### ACTION REQUESTED

- For deliberation and approval

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### 5.2 PROPOSED GENERAL AMENDMENTS TO THE WESM RULES AND WESM MANUAL ON MARKET SURVEILLANCE REGARDING MARKET SURVEILLANCE COMMITTEE PROCESSES



#### ACTION REQUESTED

- a. For approval – line by line deliberation
  1. WESM Rules
  2. Market Surveillance Manual
- b. For discussion – Proposed Amendments to the **WESM Penalty Manual** for the Rules Change Procedures for Penalty-related provisions (MSC request for comments until 10 October 2025)

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



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### PROPOSED GENERAL AMENDMENTS TO THE WESM RULES AND WESM MANUAL ON MARKET SURVEILLANCE REGARDING MARKET SURVEILLANCE COMMITTEE PROCESSES

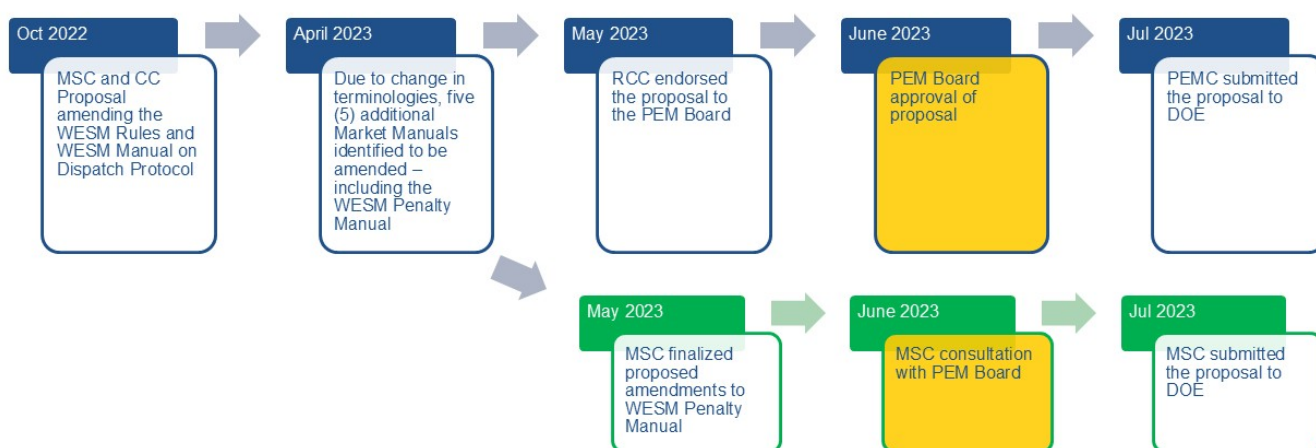
#### Background

- The Proponent of the Proposal is Market Surveillance Committee.
- On 20 June 2025, the RCC approved the publication of the proposal in the PEMC website to solicit comments from the stakeholders.
- 25 June 2025 to 05 August 2025 – Commenting period of the proposal. The proposal received comments from:
  - Aboitiz Power Corporation (APC)
  - Millenium Energy Inc./Panasa Energy Inc. (MEI/PEI)
  - National Grid Corporation of the Philippines (NGCP)
- 11 September 2025 – MSC submitted its responses to the comments received from the stakeholders.

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### PROPOSALS AFFECTING WESM PENALTY MANUAL

Proposed Amendments to the WESM Rules and Various Manuals regarding Maximum Available Capacity (2022-2023)



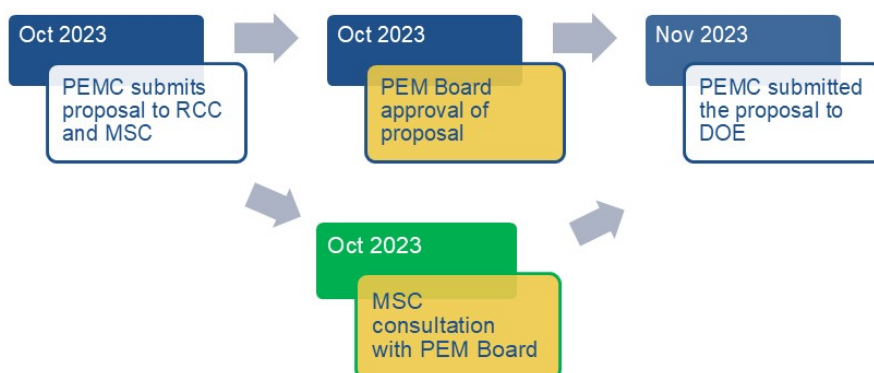
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### PROPOSALS AFFECTING WESM PENALTY MANUAL

'Proposed Urgent Amendments to the WESM Rules and WESM Manual on Dispatch Protocol and Proposed New Manual on Ancillary Services Monitoring regarding Reserve Market Compliance and Related Enforcement Actions (2023)



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### PROPOSED AMENDMENTS TO THE WESM PENALTY MANUAL FOR THE RULES CHANGE PROCEDURES FOR PENALTY-RELATED PROVISIONS

Background

- The MSC requested comments until 10 October 2025
- WESM Rules Clause 7.2.5.5 –
  - The Market Surveillance Committee shall review the WESM Penalty Manual from time to time as may be necessary, and in consultation with the Rules Change Committee, Compliance Committee and the PEM Board, recommend changes thereto, provided, that changes on the same shall be subject to the approval of the DOE.

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## MEETING MINUTES

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Date & Time : 19 September 2025, 9:00 AM to 3:00 PM  
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### ACTION REQUESTED

- a. For approval – line by line deliberation
  1. WESM Rules
  2. Market Surveillance Manual
- b. For discussion – Proposed Amendments to the **WESM Penalty Manual** for the Rules Change Procedures for Penalty-related provisions (MSC request for comments until 10 October 2025)

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



### 5.3. PROPOSED URGENT AMENDMENTS TO WESM MANUAL ON DISPATCH PROTOCOL ON THE ISSUANCE AND COVERAGE OF DISPATCH SCHEDULE BELOW MINIMUM STABLE LOAD





## MEETING MINUTES

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### ACTION REQUESTED

- Approval of 2<sup>nd</sup> extension of the effectivity of *Urgent Amendments regarding the Issuance and Coverage of Dispatch Schedules below Minimum Stable Load (Pmin)* approved under PEM Board Resolutions No. 2024-77-05 and 2025-82-03
  - For 6 months from 25 October 2025 to 25 April 2026; or
  - Until the DOE approved the corresponding General Amendments approved under PEM Board Resolution No. 2025-82-03.

35 PROPOSED AMENDMENTS ON THE ISSUANCE AND COVERAGE OF DISPATCH SCHEDULES BELOW MINIMUM STABLE LOAD



### BACKGROUND

| Dates                               | Activities                                                                                                                                                                                                                                                      |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 23 October 2024                     | PEM Board approval of the Urgent Amendment (PEM Board Resolution No. 2024-77-05)                                                                                                                                                                                |
| 25 October 2024                     | Start of Effectivity of the Urgent Amendment                                                                                                                                                                                                                    |
| 30 October 2024 to 11 December 2024 | Commenting Period of the corresponding general amendment; comments received from: <ol style="list-style-type: none"> <li>1. ACEN Corporation</li> <li>2. National Grid Corporation of the Philippines</li> <li>3. WESM Market Surveillance Committee</li> </ol> |
| 17 January 2025                     | 242 <sup>nd</sup> RCC (Regular) Meeting – RCC deliberation with commenters and proponent present                                                                                                                                                                |
| 21 February 2025                    | 243 <sup>rd</sup> RCC (Regular) Meeting – RCC provisionally approved the proposal and request for extension of effectivity of corresponding urgent amendment.                                                                                                   |
| 13 March 2025                       | RCC approval of the proposal (RCC Resolution No. 2025-01) and request for extension of effectivity of corresponding urgent amendment.                                                                                                                           |
| 25 April 2025                       | Expiration of 6-month effectivity of implementation of Urgent Amendment                                                                                                                                                                                         |

36 PROPOSED AMENDMENTS ON THE ISSUANCE AND COVERAGE OF DISPATCH SCHEDULES BELOW MINIMUM STABLE LOAD





## MEETING MINUTES

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## BACKGROUND

| Dates                            | Activities                                                                                                                                                                                                                                                                                            |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>25 October 2024</b>           | Start of effectivity date of the Revised Rules and Manual per PEM Board Resolution No. 2024-77-05 with the expiration of 25 April 2025.                                                                                                                                                               |
| <b>January to February 2025</b>  | Processing of the corresponding General Amendments – RCC deliberations and decision on the General Amendments which were reflected in its RCC Resolution No. 2025-01.                                                                                                                                 |
| <b>26 March 2025</b>             | PEM Board approved, through PEM Board Resolution No. 2025-82-03, the following: <ul style="list-style-type: none"> <li>• Extension of effectivity of the subject Urgent Amendments for another six (6) months or until 25 October 2025; and</li> <li>• The corresponding General Amendment</li> </ul> |
| <b>24 April 2025</b>             | Submission of General Amendments to DOE for final approval and ERC for information                                                                                                                                                                                                                    |
| <b>September to October 2025</b> | Ongoing DOE Public Consultations: <ul style="list-style-type: none"> <li>• 02 September 2025 – Luzon (Alabang)</li> <li>• 24 September 2025 – Visayas (Cebu)</li> <li>• 01 October 2025 – Mindanao (Cagayan De Oro)</li> </ul>                                                                        |

37 PROPOSED AMENDMENTS ON THE ISSUANCE AND COVERAGE OF DISPATCH SCHEDULES BELOW MINIMUM STABLE LOAD



## THE PROPOSAL

The proposal was initiated by PEMC to provide of guidelines for the dispatch of generating units having energy real-time dispatch schedules below their minimum stable load.

- Said guidelines were originally provided in WESM Manual on Protocol for Central Scheduling and Dispatch of Energy and Contracted Reserves (PCSD Manual), which ceased effectivity with the commercial operations of the reserve market

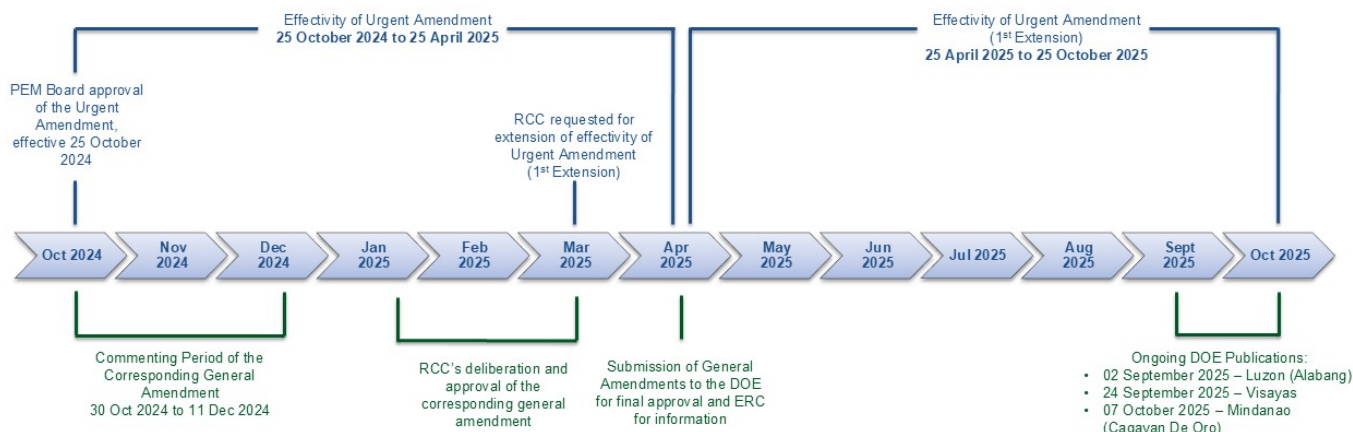


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### TIMELINE OF EVENT

#### URGENT AMENDMENT



#### GENERAL AMENDMENT

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### ACTION REQUESTED

- Approval of 2<sup>nd</sup> extension of the effectivity of *Urgent Amendments regarding the Issuance and Coverage of Dispatch Schedules below Minimum Stable Load (Pmin)* approved under PEM Board Resolutions No. 2024-77-05 and 2025-82-03
  - For 6 months from 25 October 2025 to 25 April 2026; or
  - Until the DOE approved the corresponding General Amendments approved under PEM Board Resolution No. 2025-82-03.

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PROPOSED AMENDMENTS ON THE ISSUANCE AND COVERAGE OF DISPATCH SCHEDULES BELOW MINIMUM STABLE LOAD

## MEETING MINUTES

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## VI. OTHER MATTERS



### 6.1 UPDATE ON THE PROPOSALS





## MEETING MINUTES

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### UPDATES ON THE PROPOSALS

Urgent Amendments – Ongoing implementation

|   | Proposal                                                                                                                                                                                 | Proponent | Update/Status                                                                                                                                                                                                                                                                                                                                                          |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Proposed Urgent Amendments on WESM Manual on Dispatch Protocol (WESM DP) on Issuance and Coverage of Dispatch Schedules below <b>Minimum Stable Load</b>                                 | PEMC      | <ul style="list-style-type: none"> <li>23 October 2024 – Approval of proposal (PEM Board Resolution No. 2024-77-05)</li> <li>26 March 2025 – Extension of effectivity (PEM Board Resolution No. 2025-82-03)</li> <li><b>Effectivity of WESM DP Issue 21.1: 25 October 2024 to 25 October 2025</b></li> <li><b>Request for extension per Agenda Item 5.3</b></li> </ul> |
| 2 | Proposed <b>Revision to the Urgent Amendments</b> to the Ancillary Services Monitoring Manual (WESM ASMM) regarding <b>Reserve Conformance Standards</b> and related Enforcement Actions | PEMC      | <ul style="list-style-type: none"> <li>10 December 2024 - Approval of proposal (PEM Board Resolution No.2024-79-01)</li> <li>28 May 2025 – Extension of effectivity PEM Board Resolution No. 2025-85-03</li> <li><b>Effectivity of the WESM ASMM Issue 1.2: 12 December 2024 to 12 December 2025</b></li> </ul>                                                        |



### UPDATES ON THE PROPOSALS

General Amendments – Under RCC Evaluation (4)

|   | Proposal                                                                                                                                                                  | Proponent | Update/Status                                                                                                                                                                                                                                                                                          |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the <b>Validation Process of Reported Discrepancies</b> in the <b>Dispatch Instruction Report</b> | NGCP      | <ul style="list-style-type: none"> <li>Commenting period: 25 February 2025 to 11 April 2025</li> <li>Comments received from APC, CENPRI, DOE, IEMOP, MEI/PEI, MERALCO, MSC, PEMC, SPC/SIPC, and TC</li> <li><b>20 Jun, 18 Jul, 15 Aug &amp; 19 Sep 2025 - RCC Deliberation (4 Meetings)</b></li> </ul> |
| 2 | Proposed General Amendments to the WESM Rules and Various WESM Manuals on the <b>Market Surveillance Committee Processes</b>                                              | MSC       | <ul style="list-style-type: none"> <li>Commenting period: 25 June 2025 to 05 August 2025</li> <li>Comments received from APC, MEI/PEI &amp; NGCP</li> <li><b>19 Sept 2025 – RCC Deliberation (1 Meeting)</b></li> </ul>                                                                                |





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## UPDATES ON THE PROPOSALS

### General Amendments – Under RCC Evaluation (4)

|   | Proposal                                                                                                                                                                                                                                | Proponent        | Update/Status                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | Proposed General Amendments on the Harmonization of the WESM and Retail Rules and Market Manuals with <b>ERC Resolution No. 13 Series of 2024</b> ("A Resolution Adopting the Omnibus Rules for Customer Choice Programs")              | IEMOP            | <ul style="list-style-type: none"> <li>05 August 2025 – Submission of proposal to RCC Secretariat; Substitute proposal to the proposals withdrawn by IEMOP re No Outstanding Balance and Electric Retail Aggregation Program</li> <li><b>15 August – RCC approval to publish for comments, subject to revisions</b></li> <li><b>05 September – Proposal finalized</b></li> <li><b>Commenting period: 08 September 2025 to 20 October 2025</b></li> </ul> |
| 4 | Proposed General Amendments to various WESM Manuals specifically on the option to use the <b>Final Metered Quantity (MQ) data as the basis for the Final Bilateral Contract Quantity (BCQ)</b> of a Fully-contracted Generation Company | Jobin-SQM, Inc., | <ul style="list-style-type: none"> <li>07 August 2025 – Submission of the proposal to RCC Secretariat</li> <li><b>15 August – RCC approval to publish for comments, subject to revision &amp; submission of additional information</b></li> <li><b>20 August – Proposal finalized</b></li> <li><b>Commenting period: 26 August 2025 to 07 October 2025</b></li> </ul>                                                                                    |

## UPDATES ON THE PROPOSALS

### General Amendments – RCC Evaluation Deferred (2)

|   | Proposal                                                                                                                                                | Proponent | Update/Status                                                                                                                                                                                                                                                                                                                                                                                                           |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Proposed General Amendments to the WESM Rules and various WESM Market Manuals regarding <b>Energy Storage Systems</b> in view of the DOE DC2023-04-0008 | IEMOP     | <ul style="list-style-type: none"> <li>Commenting period 22 August 2024 to 07 October 2024</li> <li>Received comments from MERALCO, MEI/PEI, SPC/SIPC, MGEN, SNAP, APC, NGCP, ACEN, PEMC, and Technical Committee (TC)</li> <li><b>13 December 2024 - Deferred (As requested by proponent) pending the forthcoming issuance of the ERC Rules on Energy Storage Systems</b></li> </ul>                                   |
| 2 | Proposed Amendment to the WESM Rules and WESM Manual on Dispatch Protocol regarding <b>Must-Offer Rule</b>                                              | GNPK      | <ul style="list-style-type: none"> <li>18 October 2024 – RCC deferred deliberations pending DOE's response to GNPK</li> <li>25 October 2024 – GNPK letter to DOE on issues and concerns (cc RCC)</li> <li>05 March &amp; 14 August 2025 – RCC letter to GNPK requesting for updates on the proposal</li> <li><b>16 September 2025 – Receipt of GNPK response (see next slide) – continue to be deferred?</b></li> </ul> |



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### PROPOSED AMENDMENT TO THE WESM RULES AND WESM MANUAL ON DISPATCH PROTOCOL REGARDING MUST-OFFER RULE

We refer to your letter dated 11 August 2025 regarding GNPowder Kauswagan Ltd. Co.'s ("GNPK") proposed amendments to the WESM Rules and WESM Manuals, specifically the provisions on the Must Offer Rule and Dispatch Protocol.

Please be informed that GNPK had an initial discussion with the Department of the Energy - Power Market Development Division ("DOE-PMDD") regarding this matter. Given the complexity of the issues involved, the DOE-PMDD required time to thoroughly review and evaluate GNPK's proposal. During the discussion, it was also recommended that the matter be elevated to DOE's higher management to ensure more comprehensive consideration, which GNPK is currently pursuing.

Currently, GNPK is arranging a follow-up meeting with the DOE and the relevant technical groups to further discuss its operational and technical constraints in relation to the compliance with the existing WESM Rules and Manuals.

We sincerely regret any delays this has caused in the deliberation of GNPK's proposal. Rest assured that we will provide timely updates on the outcome of our discussions with the DOE as soon as they become available. In the meantime, we respectfully request for the Rules Change Committee ("RCC") to archive this matter pending the results of GNPK's discussion with DOE. We shall be requesting the revival of our proposal as soon as we have clarity or resolution from the DOE.

Thank you for your attention to this matter.

*\*GNPK Letter to RCC dated 16 September 2025; copy emailed to RCC on 17 September 2025*

- GNPK (Proponent) is requesting the RCC to await the results of GNPK's consultation with DOE

47 6.1 UPDATE ON THE PROPOSALS



### UPDATES ON THE PROPOSALS

General Amendments – Promulgated by DOE (1)

|   | 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"> <li>• 31 January 2024: Approval of proposal (PEM Board Resolution No. 2024-68-03)</li> <li>• DOE Public Consultations: April (3, 17, 24) 2024</li> <li>• 14 August 2025 – RCC Letter to DOE requesting for updates on the proposal</li> <li>• 19 August 2025 – Receipt of DOE DC2025-08-0011 "Adopting Further Amendments to the Wholesale Electricity Spot Market (WESM) Rules and Various WESM Market Manuals on the Interruptible Load Program Implementation" with effectivity on 31 August 2025 (see next slide)</li> <li>• 03 September 2025 – Posting of revised market documents in PEMC website</li> </ul> |





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### PROPOSED GENERAL AMENDMENTS TO THE WESM RULES AND VARIOUS WESM MANUALS ON THE INTERRUPTIBLE LOAD PROGRAM

| Market Document                             | Amendments                                                                                                                                            | PEMC Endorsed Proposal vs DOE Approval<br>(Significant differences)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WESM Rules                                  | Added basis of BCQ re-declaration to account for Interruptible Load Program (ILP) transactions                                                        | <b>Clause 3.13.1.3 – Addition of word “intend”</b><br><br><i>Trading Participants which deliver electricity pursuant to bilateral contracts with Contestable Customers and/or Directly Connected Customers that participate in the Interruptible Load Program (ILP), and intend those bilateral contracts to be accounted for in the WESM settlement as bilateral contract quantities of the Distribution Utility that implemented the ILP, shall submit or re-declare the schedule of bilateral contract quantities of the said Contestable Customers or Directly Connected Customers in accordance with Clause 3.13.1.1 of the WESM Rules and the relevant provisions of the WESM Market Manual on Billing and Settlement.</i> |
| WESM Manual on Dispatch Protocol Issue 23.1 | Added the requirement for Trading Participants to provide input on their expected capability for the upcoming week/day based on reasonable estimates. | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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### PROPOSED GENERAL AMENDMENTS TO THE WESM RULES AND VARIOUS WESM MANUALS ON THE INTERRUPTIBLE LOAD PROGRAM

| Market Document                                  | Amendments                                                            | PEMC Endorsed Proposal vs DOE Approval<br>(Significant differences)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WESM Manual on Billing and Settlement Issue 16.0 | Added the procedures in implementing Interruptible Load Program (ILP) | <b>Section 9.5.2: deleted the reference to Sections 9.5.1 (a) and 9.5.1 (b)</b><br><br><i>In relation to Sections 9.5.1(a) and 9.5.1(b) of this Manual, the System Operator and Distribution Utilities shall provide the Market Operator the list of Directly Connected Customers and Contestable Customers respectively participating in the Interruptible Load Program every 15th day of the month.</i>                                                                                                                                                                                                                                                                                                                                                                |
|                                                  |                                                                       | <b>Section 9.5.5:</b><br><ul style="list-style-type: none"> <li>Transferred the additional requirement for re-declaration (i.e. to be submitted only once) to Section 9.5.6 (new Section from DOE)</li> <li>Incorporated the condition for Directly Connected Customers (from Section 9.5.6)</li> </ul><br><i>If re-declaration is due to Section 9.5.1(a) of this Manual, the Generation Companies shall submit, only once, the re-declaration of bilateral contract quantities for (a) the relevant Contestable Customers for the account of the corresponding Distribution Utilities, or (b) Directly Connected Customers, shall be made no later than seven (7) business days from the end of the trading day when the Interruptible Load Program was activated.</i> |

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### PROPOSED GENERAL AMENDMENTS TO THE WESM RULES AND VARIOUS WESM MANUALS ON THE INTERRUPTIBLE LOAD PROGRAM

| Market Document                                              | PEMC Endorsed Proposal vs DOE Approval<br>(Significant differences)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WESM Manual on Billing and Settlement Issue 16.0<br>(cont'd) | <p><b>Section 9.5.6:</b></p> <ul style="list-style-type: none"> <li>Proposed wordings were combined with Section 9.5.5</li> <li>Combined the conditions from Section 9.5.8 and Section 9.5.9 and Renumbered to Section 9.5.6</li> <li>Deleted the last three portion of the provisions               <ul style="list-style-type: none"> <li>For avoidance of doubt – already indicated that Generation Company shall be allowed only once</li> <li>Further any correction – DOE added in the provision the deadline of submission</li> <li>The Market Operator shall notify – already incorporated in Section 9.5.7</li> </ul> </li> </ul> <p>If re-declaration is due to Section 9.5.1(b) of this Manual, the <i>Generation Companies</i> shall submit, only once, the re-declaration of bilateral contract quantities for the relevant <i>Directly Connected Customers</i> no later than seven (7) business days from the end of the trading day when the <i>Interruptible Load Program</i> was activated.</p> <p>The submission of corrected <i>bilateral contract</i> quantities by the <i>Generation Company</i> for the concerned <i>Contestable Customer</i> or <i>Directly Connected Customer</i> shall be allowed only once, given the following conditions:</p> <ol style="list-style-type: none"> <li>If the concerned <i>Generation Company</i> and <i>Distribution Utility</i> later discovers an error after the initial re-declaration of <i>bilateral contract</i> quantities, and</li> <li>If the <i>Generation Company</i> does not submit any re-declaration, and the concerned <i>Generation Company</i> and <i>Distribution Utility</i> later discover an error on the <i>bilateral contract</i> quantities.</li> </ol> <p>The <i>Generation Company</i> shall be given an additional three (3) <i>business days</i> to submit corrected <i>bilateral contract</i> quantities, from the date of the initial re-declaration.</p> |

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### PROPOSED GENERAL AMENDMENTS TO THE WESM RULES AND VARIOUS WESM MANUALS ON THE INTERRUPTIBLE LOAD PROGRAM

| Market Document                                              | PEMC Endorsed Proposal vs DOE Approval<br>(Significant differences)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WESM Manual on Billing and Settlement Issue 16.0<br>(cont'd) | <p><b>Section 9.5.7:</b></p> <ul style="list-style-type: none"> <li>Change from seven (7) business days deadline of re-declaration to ten (10) business days (in relation to the added DOE condition on 9.5.6: additional three (3) days)</li> <li>Other edits on the latter part of the provisions</li> </ul> <p>The <i>Market Operator</i> is authorized to accept the re-declaration of <i>bilateral contract</i> quantities due to the activation of the <i>Interruptible Load Program</i> subject to the <i>Generation Companies</i> to the following: made under Sections 9.5.5 and 9.5.6 of this Manual provided that such re-declaration complies with all the following requirements:</p> <ol style="list-style-type: none"> <li>The <i>bilateral contract</i> quantity re-declaration, including the correction after identifying the error, was submitted no later than seven (7) within ten (10) business days from the end of the relevant trading day when the <i>Interruptible Load Program</i> was activated;</li> <li>The <i>bilateral contract</i> quantity re-declarations were only for intervals and for the <i>Contestable Customers</i> and/or <i>Directly Connected Customers</i> that participated when the <i>Interruptible Load Program</i> was activated;</li> <li>The <i>bilateral contract</i> quantity re-declarations of <i>Generation Companies</i> correspond with their respective contract enrolments; and</li> <li>The <i>bilateral contract</i> re-declarations of <i>Generation Companies</i> follow the prescribed format and mode of submissions.</li> </ol> <p>For avoidance of doubt, in case of multiple submissions of requests for re-declarations, the earliest submitted re-declaration of <i>bilateral contract</i> quantity shall be considered by the <i>Market Operator</i>. Further, any re-declaration of <i>bilateral contract</i> quantities made under Sections 9.5.5 and 9.5.6 of this Manual made beyond the timeline prescribed in (a) hereof shall be considered non-compliant and therefore shall not be accepted by the <i>Market Operator</i>.</p> <p>The <i>Market Operator</i> shall notify the relevant <i>Generation Company</i> and relevant counterparty of the acceptance or non-acceptance of bilateral contract quantity re-declaration, as the case may be, including the reason therefor, within a period of five (5) working days from receipt thereof.</p> <p>For avoidance of doubt, in case of multiple submissions of requests for re-declarations, the earliest submitted re-declaration of <i>bilateral contract</i> quantity shall be considered by the <i>Market Operator</i>.</p> |

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### UPDATES ON THE PROPOSALS

General Amendments – For DOE Promulgation (3)

|   | Proposal                                               | Proponent | Update/Status                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---|--------------------------------------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Proposed Amendments to the <b>Rules Change Process</b> | RCC       | <ul style="list-style-type: none"> <li>28 August 2024 – Approval of proposal (PEM Board Reso No. 2024-75-01)</li> <li>13 May 2025 – PEM Board received DOE's letter</li> <li>20 May 2025 – RCC letter to PEM Board and WGO submitting recommendations</li> <li>19 June 2025 (85<sup>th</sup> 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.</li> <li><b>09 July 2025 – Submission of the response letter to the DOE</b></li> </ul> |



### UPDATES ON THE PROPOSALS

General Amendments – For DOE Promulgation (3)

|   | Proposal                                                                                                                                                                            | Proponent | Update/Status                                                                                                                                                                                               |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | Proposed General Amendments on WESM Manual on Dispatch Protocol on <b>Issuance and Coverage of Dispatch Schedules</b> regarding <b>Minimum Stable Load</b>                          | PEMC      | <ul style="list-style-type: none"> <li>26 March 2025 – Approval of proposal (PEM Board Resolution No. 2025-82-03)</li> <li>24 April 2025 – Submitted to DOE for approval and ERC for information</li> </ul> |
| 3 | Proposed <b>Revision</b> to the Urgent Amendments to the <b>Ancillary Services Monitoring Manual</b> regarding <b>Reserve Conformance Standards</b> and related Enforcement Actions | PEMC      | <ul style="list-style-type: none"> <li>28 May 2025 – Approval of proposal (PEM Board Resolution No. 2025-85-02)</li> <li>11 June 2025 – Submitted to DOE for approval and ERC for information</li> </ul>    |

- On both proposals, DOE is conducting public consultations
  - Luzon - held on 02 September (Muntinlupa City)
  - Visayas - 24 September (Cebu City)
  - Mindanao - 07 October 2025 (Cagayan de Oro City)



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### UPDATES ON THE PROPOSALS

General Amendments – For DOE's Response (1)

|   | Proposal                                                                                                                  | Proponent | Update/Status                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---|---------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Proposed General Amendments to the WESM Manual on Dispatch Protocol regarding <b>Non-security Over-riding Constraints</b> | NPC       | <ul style="list-style-type: none"> <li>25 March 2024 – Per RCC advise, NPC elevated concerns to DOE</li> <li>02 April 2024 – RCC letter to DOE providing pertinent information</li> <li>17 May 2024 – RCC approved Reso on the conclusion of NPC's Proposal for endorsement to PEM Board</li> <li>31 July 2024 – PEM Board concurred with the RCC's decision to conclude the proposed rules change</li> <li>14 August 2025 – RCC Letter to NPC requesting for updates on the proposal</li> <li><b>09 September 2025 – Receipt of NPC response (see next slide) – for closure</b></li> </ul> |

### PROPOSED GENERAL AMENDMENTS TO THE WESM MANUAL ON DISPATCH PROTOCOL REGARDING NON-SECURITY OVER-RIDING CONSTRAINTS

To further facilitate DOE's assessment, NPC submitted on 29 May 2024 technical analyses and simulations of various flood scenarios at Caliraya Dam. NPC likewise sought DOE's intervention for possible policy guidance to strike a balance between flood safety and grid/system security. On 06 November 2024, NPC reiterated its request by submitting proposed operational guidelines to aid DOE in its evaluation, particularly in light of the impacts of climate change and increasingly erratic weather patterns.

Subsequently, in its letter dated 19 November 2024, PSALM recommended that NPC's request be deferred, citing the ongoing privatization of the Caliraya-Botocan-Kalayaan (CBK) Hydroelectric Power Plants. In another letter dated 27 November 2024, DOE highlighted Section 4 of Department Circular No. 2022-10-0031, which provides that the priority dispatch of impounding hydro plants, currently categorized as scheduled plants in the WESM, shall be at the option of the renewable energy developer, subject to grid security, reliability, and contractual obligations. DOE likewise emphasized PSALM's role as Trading Party of CBK HEPP and encouraged NPC to review existing agreements with PSALM on the matter.

In view of these considerations, NPC deferred further action pending the completion of the CBK HEPP privatization process. Moving forward, NPC intends to engage now with the concerned stakeholders to establish clear and practical operational guidelines that will ensure the safe and optimized management of reservoir operations, considering the privatization of CBK HEPP has been successful. NPC remains committed to advancing this initiative in a manner that promotes both system reliability and public safety.

We highly appreciate your extended valuable assistance of the WESM RCC throughout the course of these proceedings.

56 \*NPC Letter to RCC dated 22 August 2025; copy emailed to RCC on 10 September 2025

- May 2024 & November 2024 – NPC provided further information to DOE
- November 2024 – PSALM informed NPC of the ongoing privatization of CBK HEPP
- December 2024 – DOE emphasized PSALM's role as TP of CBK HEPP and encouraged NPC & PSALM to review agreements
- NPC is awaiting completion of CBK HEPP privatization and will work with concerned parties

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### 6.2 DOE UPDATES



### 6.3 SCHEDULE OF ACTIVITIES



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### SCHEDULE OF ACTIVITIES



## VIII. ADJOURNMENT

## MEETING MINUTES

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**Philippine Electricity Market Corporation**

# Connect with PEMC

[pemc.info@wesm.ph](mailto:pemc.info@wesm.ph) +63 2 8631 8734 18F Robinsons Equitable Tower, ADB Avenue  
Ortigas Center, Pasig City 1600, Philippines

[pemcinfo](#) [pemcinfo](#) [PEMC\\_Info](#) [PEMC Info](#)

The banner features a hand holding a smartphone on the left, with the screen displaying a white electrical plug icon on a blue background. The background of the banner is split diagonally, with a bright yellow upper-left section and a light gray lower-right section. The PEMC logo is in the top right, and the main title 'Connect with PEMC' is in large blue letters. Contact information and social media links are listed at the bottom.



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Annex B – Matrix of the Proposed Revision to the Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancies in Dispatch Instruction Report

| WESM Manual on Dispatch Protocol Issue 23.1 |                |                                                                                                                                                                                                                                                                                            |                             |                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                    |                |
|---------------------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Title                                       | Section        | Provision                                                                                                                                                                                                                                                                                  | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                        | Rationale                                                                                                                                                          | RCC's Decision |
| Post Dispatch Reports and Information       | (new)          |                                                                                                                                                                                                                                                                                            |                             | <a href="#">14.5 Reporting and Publication</a>                                                                                                                                                                                                                                                                    | To add a section that outlines the publication of post-dispatch data and operation reports, as well as the procedure for reporting discrepancies in these reports. |                |
| Post Dispatch Reports and Information       | WESM DP 14.4.6 | 14.4.6 Reports prepared pursuant to Sections 14.4.1 and 14.4.2 shall be published in the <i>market information website</i> in accordance with the Market Operator Information Disclosure and Confidentiality Manual. Reports prepared pursuant to Section 14.4.5 shall be published by the |                             | <a href="#">14.4.6 14.5.1</a> Reports prepared pursuant to Sections 14.4.1 and 14.4.2 shall be published in the <i>market information website</i> in accordance with the Market Operator Information Disclosure and Confidentiality Manual. Reports prepared pursuant to Section 14.4.5 shall be published by the | Re-numbering.                                                                                                                                                      |                |





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| WESM Manual on Dispatch Protocol Issue 23.1 |                |                                                                                                                                                                                                                                                                                                                                                                          |                             |                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                  |                |
|---------------------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|----------------|
| Title                                       | Section        | Provision                                                                                                                                                                                                                                                                                                                                                                | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                                               | Rationale                                                                                                        | RCC's Decision |
|                                             |                | <i>Market Operator</i> in the <i>market information website</i> no later than one (1) week from the <i>relevant trading</i> day in accordance with WESM Rules Clause 3.15.13.1. Reports on <i>market intervention</i> , in accordance with Section 14.4.3, may be provided to the <i>Trading Participants</i> upon request in accordance with WESM Rules Clause 6.9.4.2. |                             | <i>Market Operator</i> in the <i>market information website</i> no later than one (1) week from the <i>relevant trading</i> day in accordance with WESM Rules Clause 3.15.13.1. Reports on <i>market intervention</i> , in accordance with Section 14.4.3, may be provided to the <i>Trading Participants</i> upon request in accordance with WESM Rules Clause 6.9.4.2. |                                                                                                                  |                |
| Post Dispatch Reports and Information       | WESM DP 14.4.7 | 14.4.7 Each <i>Generation Company</i> shall validate all the data in the Dispatch Instruction Report as published by the <i>Market Operator</i> in the <i>market information website</i> . Any discrepancy in these                                                                                                                                                      |                             | <u>14.4.7</u> <u>14.5.2</u> Each <i>Generation Company</i> shall validate all the data in the Dispatch Instruction Report as published by the <i>Market Operator</i> in the <i>market information website</i> . Any discrepancy                                                                                                                                          | Re-numbering.<br><br>To provide criteria for the reported discrepancy in this section to be complied with by the |                |





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| WESM Manual on Dispatch Protocol Issue 23.1 |                |                                                                                                                                                                                                                                                                                                                                                         |                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                             |                |
|---------------------------------------------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|----------------|
| Title                                       | Section        | Provision                                                                                                                                                                                                                                                                                                                                               | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                 | Rationale                                                   | RCC's Decision |
|                                             |                | reports shall be reported by the <i>Generation Company</i> to the <i>Market Operator</i> within two (2) weeks after the <i>Market Operator's</i> publication of these reports. Failure by the <i>Generation Company</i> to report to the Market Operator any discrepancy within the period defined herein shall render the data in the report as final. |                             | in these reports shall be reported by the <i>Generation Company</i> to the <i>Market Operator</i> within two (2) weeks after the <i>Market Operator's</i> publication of these reports <u>and in accordance with the criteria specified in Section 14.5.9 (a) of this Manual.</u> Failure by the <i>Generation Company</i> to report to the Market Operator any discrepancy within the period defined herein shall render the data in the report as final. | Generation Company.                                         |                |
| Post Dispatch Reports and Information       | WESM DP 14.4.8 | 14.4.8 Within two (2) working days from receipt of a report, the <i>Market Operator</i> shall request the                                                                                                                                                                                                                                               |                             | <u>14.4.8 14.5.3</u> Within two (2) working days from receipt of a report, the <i>Market Operator</i> shall                                                                                                                                                                                                                                                                                                                                                | Re-numbering.<br><br>To include the review of <i>Market</i> |                |





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| WESM Manual on Dispatch Protocol Issue 23.1 |                |                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                          |                |
|---------------------------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Title                                       | Section        | Provision                                                                                                                                                                                                                                                                                      | Original Proposed Amendment                                                                                                                                                                                                                                               | Revised Proposed Amendment                                                                                                                                                                                                                                                                                   | Rationale                                                                                                                                                                                | RCC's Decision |
|                                             |                | <i>System Operator</i> to validate a reported discrepancy by a generator.                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                           | <u>review the report in accordance with the criteria set out in Section 14.5.9 (a) of this Manual. If the criteria are met, the Market Operator shall then</u> request the <i>System Operator</i> to validate a reported discrepancy by a generator.                                                         | <i>Operator</i> on the report based on the criteria set out in Section 14.4.10 (a), specifically for completeness, before sending the validation request to the <i>System Operator</i> . |                |
| Post-dispatch Reports and Information       | WESM DP 14.4.9 | 14.4.9 The <i>System Operator</i> shall perform reconciliation with the <i>Generation Company</i> and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the <i>Market Operator</i> . If the <i>Market</i> | 14.4.9 The <i>System Operator</i> shall perform reconciliation with the <i>Generation Company</i> and provide the results of its validation of the reported discrepancies within seven (7) working days from the receipt of the request from the <i>Market Operator</i> . | <u>14.4.9 14.5.4</u> The <i>System Operator</i> shall perform reconciliation with the <i>Generation Company</i> and provide the results of its validation of the reported discrepancies <u>to the Market Operator</u> within seven (7) working days from the receipt of the request <u>Upon receipt, the</u> | Re-numbering.<br><br>To include a provision for the revalidation process of data contained in the Dispatch Instruction Report should the Generator Companies submit                      |                |



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| WESM Manual on Dispatch Protocol Issue 23.1 |         |                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                     |                |
|---------------------------------------------|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|----------------|
| Title                                       | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                                             | Original Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Rationale                                                                                                           | RCC's Decision |
|                                             |         | <p><i>Operator</i> has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained. If the <i>Generation Company</i> claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the <i>Generation Company</i> may subject the said claim under the WESM dispute resolution process.</p> | <p><b><u>If the <i>Trading Participants</i> find any further discrepancies in the submitted report, the <i>Generator Company</i> must report these to the <i>Market Operator</i> within three (3) working days from the receipt of the report. The <i>Market Operator</i> shall review the revalidation request, and if deemed to be with merit, shall then request the <i>System Operator</i> to re-validate the reported discrepancies. The <i>System Operator</i> shall then provide the results of its re-validation within seven (7) working days</u></b></p> | <p><b><u><a href="#">Market Operator shall provide the results to the <i>Generation Company</i>.</a></u></b></p> <p><b><u>14.5.5 If the <i>Trading Participants-Generation Company</i> find any further discrepancies in the submitted report, the <i>Generator Company</i> must report these to the <i>Market Operator</i> within three (3) working days from the receipt of the report in accordance with the criteria specified in Section 14.5.9 (b) of this Manual. However, reporting of such discrepancies shall only be made once,</u></b></p> | <p>a request for further validation of the <i>System Operator's</i> submitted report on the discrepancy claims.</p> |                |



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| WESM Manual on Dispatch Protocol Issue 23.1 |         |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |           |                |
|---------------------------------------------|---------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------|
| Title                                       | Section | Provision | Original Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Rationale | RCC's Decision |
|                                             |         |           | <p><b><u>from receiving the request from the Market Operator.</u></b></p> <p>If the <i>Market Operator</i> has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report shall be maintained. If the <i>Generation Company</i> claims additional compensation related to the reported discrepancies that were not validated within the prescribed timeline, the <i>Generation Company</i> may subject the said claim under the WESM dispute resolution process.</p> | <p><b><u>14.5.6 Within two (2) working days from the receipt of the report, the Market Operator shall review the revalidation request in accordance with the same criteria. and if deemed to be with merit, If the criteria are met, 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 to the Market Operator within seven (7) working days from receiving the</u></b></p> |           |                |





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| WESM Manual on Dispatch Protocol Issue 23.1 |         |           |                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |           |                |
|---------------------------------------------|---------|-----------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------|
| Title                                       | Section | Provision | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Rationale | RCC's Decision |
|                                             |         |           |                             | <p><u>request from the Market Operator.</u></p> <p><u>14.5.7 The Market Operator shall publish the results of System Operator's validation in the market information website.</u> If the <i>Market Operator</i> has not received any validation within the prescribed timeline, the published data from the Dispatch Instruction Report <u>in Section 14.5.1</u> shall be maintained.</p> <p><u>14.5.8</u> If the <i>Generation Company</i> claims additional compensation related to the reported discrepancies that were</p> |           |                |





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| WESM Manual on Dispatch Protocol Issue 23.1 |         |           |                             |                                                                                                                                                                                                                                                                              |                                                                                              |                |
|---------------------------------------------|---------|-----------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------|
| Title                                       | Section | Provision | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                   | Rationale                                                                                    | RCC's Decision |
|                                             |         |           |                             | not validated within the prescribed timeline, the <i>Generation Company</i> may subject the said claim under the WESM dispute resolution process.                                                                                                                            |                                                                                              |                |
| Post-dispatch Reports and Information       | (New)   |           |                             | <u>14.5.9 All reported discrepancies should conform to the following criteria:</u><br><u>a. For those reported under Section 14.5.2</u><br><u>i. The inconsistencies are between the published Dispatch Instruction Report and the Generation Company's data on dispatch</u> | To provide criteria for <i>Market Operator's</i> review of the submitted discrepancy report. |                |



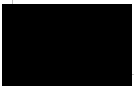
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| WESM Manual on Dispatch Protocol Issue 23.1 |         |           |                             |                                                                                                                                                                                                                                                                                                                                                                                                         |           |                |
|---------------------------------------------|---------|-----------|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------|
| Title                                       | Section | Provision | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                              | Rationale | RCC’s Decision |
|                                             |         |           |                             | <p><u>instruction, specifically on the quantity (MW) and category (e.g. real power balancing, must-run unit).</u></p> <p><u>ii. Submitted within 14 calendar days or two (2) weeks following the publication of the relevant report in the market information website.</u></p> <p><u>iii. The affected dispatch intervals are within the covered period of the Dispatch Instruction Report. For</u></p> |           |                |



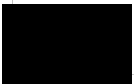
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| WESM Manual on Dispatch Protocol Issue 23.1 |         |           |                             |                                                                                                                                                                                                                                                                                                                                                           |           |                |
|---------------------------------------------|---------|-----------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------|
| Title                                       | Section | Provision | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                                | Rationale | RCC’s Decision |
|                                             |         |           |                             | <a href="#"><u>example, the Market Operator published the weekly Dispatch Instruction Report for 01-07 September 2025 (Monday to Sunday) on 09 September 2025. The Generator Company can submit any discrepancy report for this specific period from 10-23 September 2025, only.</u></a><br><a href="#"><u>iv. Submitted with complete supporting</u></a> |           |                |





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| WESM Manual on Dispatch Protocol Issue 23.1 |         |           |                             |                                                                                                                                                                                                                                                                                                                                                          |           |                |
|---------------------------------------------|---------|-----------|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------|
| Title                                       | Section | Provision | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                               | Rationale | RCC's Decision |
|                                             |         |           |                             | <u>documents, including but not limited to logs, screenshots, correspondences, and voice recordings.</u><br><br><u>b. For further discrepancies reported under Section 14.5.5</u><br><u>i. The nature and type of the revalidation request must be the same as the request in Section 14.5.9 (a). No new data or issues outside the original request</u> |           |                |





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| WESM Manual on Dispatch Protocol Issue 23.1 |              |                                                                                          |                             |                                                                                                                                                                                                                                                                                                                 |                                                     |                |
|---------------------------------------------|--------------|------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|----------------|
| Title                                       | Section      | Provision                                                                                | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                      | Rationale                                           | RCC's Decision |
|                                             |              |                                                                                          |                             | <u>will be considered.</u><br>ii. <u>Submitted with complete supporting documents, including but not limited to logs, screenshots, correspondences, and voice recordings.</u><br>iii. <u>Submitted within two (2) working days from the receipt of the initial validation results from the Market Operator.</u> |                                                     |                |
| Reporting and Publication                   | WESM DP 17.5 | 17.5.1 Each <i>generator</i> shall validate all the data related to <i>MRU</i> contained |                             | <del>17.5.1</del> Each <i>generator</i> <u>Generation Company</u> shall validate all the data                                                                                                                                                                                                                   | To refer any discrepancy report in the MRU shall be |                |





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| WESM Manual on Dispatch Protocol Issue 23.1 |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                           |                |
|---------------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|----------------|
| Title                                       | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Original Proposed Amendment | Revised Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Rationale                                                                 | RCC's Decision |
|                                             |         | in the <i>Dispatch</i> Deviation Report as published by the <i>Market Operator</i> in the <i>Market information website</i> . Any discrepancy in these reports shall be reported by the <i>Generator</i> to the <i>Market Operator</i> within two weeks after the <i>Market Operator's</i> publication of these reports. Failure by the <i>Generator</i> to report to the <i>Market Operator</i> any discrepancy within the period defined herein shall render the <i>MRU</i> data relative to the <i>Generator</i> final. |                             | related to <i>MRU</i> contained in the <i>Dispatch</i> Deviation Report as published by the <i>Market Operator</i> in the <i>Market information website</i> . Any discrepancy in these reports shall be reported by the <i>Generator</i> to the <i>Market Operator</i> in accordance with <b>Section 14.5 of this Manual</b> within <del>two weeks after the <i>Market Operator's</i> publication of these reports. Failure by the <i>Generator</i> to report to the <i>Market Operator</i> any discrepancy within the period defined herein shall render the <i>MRU</i> data relative to the <i>Generator</i> final.</del> | process in accordance with Section 14.5 of WESM Dispatch Protocol Manual. |                |





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Annex B – Matrix of the Proposed Revision to the Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancies in Dispatch Instruction Report

| WESM Manual on Dispatch Protocol Issue 23.1 |                |                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                 |                |
|---------------------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Title                                       | Section        | Provision                                                                                                                                                                                                                                                                        | Original Proposed Amendment                                                                                                                                                                                                                                       | Revised Proposed Amendment                                                                                                                                                                                                                                                                     | Rationale                                                                                                                                                                       | RCC's Decision |
| Reporting and Publication                   | WESM DP 17.5   | 17.5.2 Within two (2) working days from receipt of a reported discrepancy related to must-run unit, the <i>Market Operator</i> shall request the <i>System Operator</i> , copy furnished the concerned generator, to validate a reported discrepancy by a generator.             |                                                                                                                                                                                                                                                                   | <del>17.5.2 Within two (2) working days from receipt of a reported discrepancy related to must-run unit, the Market Operator shall request the System Operator, copy furnished the concerned generator, to validate a reported discrepancy by a generator.</del>                               | Proposed to delete this section and refer to Section 14.5 of WESM Dispatch Protocol Manual for the processing of discrepancy report.                                            |                |
| Reporting and Publication                   | WESM DP 17.5.3 | 17.5.3 The <i>System Operator</i> shall provide the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the <i>Market Operator</i> . If the <i>Market Operator</i> has not received any validation within the | 17.5.3 The <i>System Operator</i> shall provide the results of its validation of the reported discrepancies within seven (7) working days from receipt of the request from the <i>Market Operator</i> .<br><br><b><u>If the Trading Participants find any</u></b> | <del>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, the</del> | NGCP's Rationale: To include a provision for the revalidation process of data related to MRU contained in the Dispatch Instruction Report should the Generator Companies submit |                |



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Annex B – Matrix of the Proposed Revision to the Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancies in Dispatch Instruction Report

| WESM Manual on Dispatch Protocol Issue 23.1 |         |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                         |                                                                                                                                                                                                                                                                                              |                |
|---------------------------------------------|---------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Title                                       | Section | Provision                                                                                                             | Original Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Revised Proposed Amendment                                                                              | Rationale                                                                                                                                                                                                                                                                                    | RCC's Decision |
|                                             |         | prescribed timeline, the <i>Market Operator</i> shall consider the submitted discrepancies by the Generator as valid. | <b><u>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></b> | <del><i>Market Operator shall consider the submitted discrepancies by the Generator as valid.</i></del> | <p>a request for further validation of the <i>System Operator's</i> submitted report on the discrepancy claims.</p> <p>RCC Secretariat's Rationale: Proposed to delete this section and refer to Section 14.5 of WESM Dispatch Protocol Manual for the processing of discrepancy report.</p> |                |





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Annex B – Matrix of the Proposed Revision to the Proposed Amendments to the WESM Manual on Dispatch Protocol relative to the Validation Process of Reported Discrepancies in Dispatch Instruction Report

| WESM Manual on Dispatch Protocol Issue 23.1 |         |           |                                                                                                                                                                                                |                            |           |                |
|---------------------------------------------|---------|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-----------|----------------|
| Title                                       | Section | Provision | Original Proposed Amendment                                                                                                                                                                    | Revised Proposed Amendment | Rationale | RCC’s Decision |
|                                             |         |           | If the <i>Market Operator</i> has not received any validation within the prescribed timeline, the <i>Market Operator</i> shall consider the submitted discrepancies by the Generator as valid. |                            |           |                |



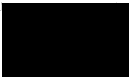
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Annex C – Matrix on the Consolidated Comments to the Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Market Surveillance Committee Processes

| Commenter | General Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Proponent's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| APC       | <p>It is a fundamental principle that the provisions of the WESM Penalty Manual must be updated to align with any new or altered obligations imposed upon WESM Participants by developments within the WESM Rules and Manuals. Consequently, any such developments shall trigger a corresponding amendment process for the WESM Penalty Manual.</p> <p>To ensure the timely initiation of the Market Surveillance Committee's (MSC) review and amendment processes, it is incumbent upon the WGA President, WESM Governance Office and/or the Market Assessment Group, in their capacity as the WGC's secretariat, to monitor all WESM rule developments. Based on this monitoring, said office or group shall be responsible for prompting the MSC to commence revisions to the WESM Penalty Manual.</p> <p>We acknowledge the existing practice wherein the MSC may submit comments on proposed amendments to the WESM Rules and Manuals. While this demonstrates the MSC's awareness of market governance updates, it is nevertheless imperative that the propulsion for amending the Penalty Manual may originate from a body within PEMC that possesses full visibility of all developments in the rules change process, including internal deliberations in the RCC</p> | <p>Whenever there are developments in the market that require revisions to the WESM Rules and Manuals, any corresponding revisions to the WESM Penalty Manual will also be reviewed and considered.</p> <p>Additionally, the PEMC Market Assessment Department currently implements a rule mapping process, which serves to identify and visualize the interrelated provisions across the WESM Rules and Market Manuals. This process helps ensure that any proposed revisions are thoroughly evaluated by highlighting the connections and dependencies among various provisions. Through rule mapping, the department can determine which related provisions may be affected and require corresponding updates, thereby promoting consistency and coherence across all WESM Rules and Market Manuals.</p> <p>The MSC agrees with the comment. Under the current provision of the WESM Penalty Manual Section 7.1.1, any proposed amendments by any interested parties other than the MSC shall be done by submitting formal proposals to the MSC.</p> |



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|  | <p>that necessitate a parallel amendment to the WESM Penalty Manual.</p> <p>It is also proposed that for MSC/RCC’s consideration that, upon the PEM Board’s approval of an amendment to the WESM Rules or other Manuals which vests a new obligation upon a WESM Participant, a careful and concurrent consideration be given to establishing a counterpart provision within the WESM Penalty Manual. Should such a parallel amendment be deemed necessary, it is further suggested that the submission of both the amended WESM Rule/Manual and the corresponding WESM Penalty Manual provision be made jointly to the Department of Energy (DOE) for approval, in the interest of administrative efficiency and coherence.</p> <p>We respectfully seek clarification as to whether the proposed amendment implies that the procedure and guidelines for revising the WESM Penalty Manual, together with any proposed amendments thereto, shall be subject to the direct approval of the Department of Energy (DOE) subsequent to an endorsement solely from the Market Surveillance Committee (MSC).</p> <p>We respectfully suggest that the aforementioned documents should instead be endorsed by the WGA President to the DOE, following the endorsement by the MSC. This procedure</p> | <p>Currently, the submission of proposed amendments to the WESM Penalty Manual and other related manuals to the DOE is typically carried out within the same timeline. This approach supports consistency and administrative efficiency in the review and approval process and ensures that all relevant documents are aligned with the latest policy developments. This is the case with the previous proposals to the WESM Penalty Manual and other manuals.</p> <p>Yes, the MSC confirmed that amendments to the WESM Penalty Manual will be subject to the approval of the DOE as endorsed by the MSC pursuant with the Section 3.3 of the WESM Penalty Manual Issue 3.0. In addition, this mandate of the MSC was promulgated by the DOE through DC2006-11-0013 following the recommendation of the PEM Board through resolution no. 2006-45 as deliberated by the IRCC 28<sup>th</sup> meeting in 2006.</p> <p>Under the WESM Penalty Manual Section 7.1.3, the MSC shall conduct consultation with Rules Change Committee, PEM Board, and the WESM Members. In addition, the WGA</p> |
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|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|      | is essential to ensure that all requisite triggers and stakeholder inputs, including the internal deliberations of the Rules Change Committee (RCC) that may warrant a new obligation for a WESM Participant and, by extension, a parallel provision in the Penalty Manual, have been duly considered and incorporated into PEMC’s final proposal to the DOE.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | President as the WESM Governance Officer will be informed of any endorsement of the MSC to the DOE.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| NGCP | <p>The proposed amendments authorizing the Market Surveillance Committee (MSC) in reviewing and approving proposed changes to the WESM Penalty Manual raises questions of procedural regularity and compliance with the governing regulatory framework.</p> <p>Under the present rules, the MSC's role is primarily monitoring, investigating, and recommending actions concerning breaches of market rules. The authority to approve amendments or policy manuals such as the WESM Penalty Manual rests with the PEM Board, subject to DOE’s approval.</p> <p>Should the MSC unilaterally approve such changes without approval from the PEM Board, such act exceeds its authority. The authority of MSC makes it equivalent to PEM Board with respect to WESM Penalty Manual.</p> <p>Further, the proposed amendments may even undermine stakeholder trust in the market’s institutional integrity.</p> | <p>WESM Rules Clause 7.2.5.5, Market Surveillance Manual Section 3.1 (g), WESM Penalty Manual Sections 3.3, 7.1.1, and 7.1.3, already provides for the MSC’s authority in reviewing and endorsing any proposed changes to the WESM Penalty Manual for the consideration and approval of the DOE. In addition, this mandate of the MSC was vested to the Committee way back in 2006 through the DOE DC2006-11-0013 following the recommendation of the PEM Board through Resolution No. 2006-45 as deliberated by the IRCC 28<sup>th</sup> meeting. In the said recommendations, no less than the PEM Board and DOE agreed that the WESM Penalty Manual will fall under the oversight of the MSC recognizing the independent composition of the Committee.</p> <p>In addition, the proposed amendment does not seek to expand the authority of the MSC beyond its current mandate. Rather, it aims to provide guidance on the process that each proposed amendment to the WESM Penalty Manual must undergo—from initial deliberation to consultation with relevant entities—as already stipulated in the abovementioned WESM Rules and</p> |



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|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                            |
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|  | <p>Any proposed amendments to the WESM Rules or the Penalty Manual should be endorsed to the Rules Change Committee and to be submitted to the PEM Board for deliberation and formal approval, and subsequently submitted to the DOE for approval.</p> <p>The proposals to amend the provisions of the WESM Rules or the Penalty Manual should be approved by the DOE, while PDM-related matters should be approved by the ERC in accordance with Section 30 and Section 43 of the EPIRA</p> | <p>Market Manuals. Also, the proposal is intended to harmonize the WESM Rules with the provisions and mandates outlined in the Market Surveillance Manual and the WESM Penalty Manual.</p> |
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| WESM RULES as of 05 November 2024                                 |                                                             |                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                  |                                                                                                                                                 |                                                                                                                                                         |                                                                                                                         |                                                    |              |
|-------------------------------------------------------------------|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|--------------|
| Title                                                             | Section                                                     | Provision                                                                                                                                                                                                                        | Proposed Amendment                                                                                                                                                                                                               | Rationale                                                                                                                                       | Comments                                                                                                                                                | Proposed Wording based on Comments                                                                                      | Original Proponent’s Response                      | RCC Decision |
| Chapter 1 – Introduction<br><br>1.6 Market Surveillance Committee | 1.6.2 Responsibilities of the Market Surveillance Committee | <p>The <i>Market Surveillance Committee</i> shall from time to time as necessary and appropriate or whenever the <i>PEM Board</i> directs:</p> <p>xxx</p> <p>(d) Assist the <i>Rules Change Committee</i> in relation to its</p> | <p>The <i>Market Surveillance Committee</i> shall from time to time as necessary and appropriate or whenever the <i>PEM Board</i> directs:</p> <p>xxx</p> <p>(d) Assist the <i>Rules Change Committee</i> in relation to its</p> | To reflect the responsibility of the MSC to review proposed amendments to the WESM Penalty Manual pursuant to Clause 7.2.5.5 of the WESM Rules. | <p><b>NGCP:</b></p> <p>7.2.5.5 of the WESM Rules does not grant the Market Surveillance Committee the power to initiate changes to the WESM Penalty</p> | <p><b>NGCP:</b></p> <p>Propose or recommend changes to the Rules Change Committee with respect to amendments of the</p> | <p><i>See response in the general comment.</i></p> |              |



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| WESM RULES as of 05 November 2024 |         |                                                                         |                                                                                                                                                                                                                                                                       |           |                                                                                                                                                                                                                                                                                             |                                    |                               |              |
|-----------------------------------|---------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------------------------|--------------|
| Title                             | Section | Provision                                                               | Proposed Amendment                                                                                                                                                                                                                                                    | Rationale | Comments                                                                                                                                                                                                                                                                                    | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                   |         | assessment of proposals to amend the <i>WESM Rules</i> under Chapter 8. | assessment of proposals to amend the <i>WESM Rules</i> under Chapter 8; <u>and</u><br><br><u>(e) Initiate or process proposed changes to the WESM Penalty Manual pursuant to Clause 7.2.5.5 and following the procedures outlined in Clause 8.4 of the WESM Rules</u> |           | Manual. The authority granted to the Market Surveillance Committee is recommendatory only.<br><br>The wording also suggests that the Market Surveillance Committee is the one to initiate the rules change before the PEM Board which is clearly within the scope of Rules Change Committee | WESM Penalty Manual.               |                               |              |



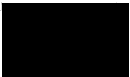
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| WESM RULES as of 05 November 2024 |                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                 |                                                                                                                                                                                 |                                                    |              |
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| Title                             | Section                  | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Comments                                        | Proposed Wording based on Comments                                                                                                                                              | Original Proponent’s Response                      | RCC Decision |
| Chapter 8 – Rule Change           | 8.1 – Scope of Chapter 8 | <p>Proposals for changes, amendments, and modifications of the <i>WESM Rules</i> and <i>Market Manuals</i>, as well as the adoption of new <i>Market Manuals</i> shall be undertaken in accordance with the provisions of this chapter.</p> <p>This chapter 8 sets out:<br/>(a) The composition and manner of appointment of the <i>Rules Change Committee</i>;<br/>(b) The procedure for effecting a change to the <i>WESM Rules</i> and <i>Market Manuals</i>; and<br/>(c) The procedure for approval of a change to the <i>WESM Rules</i> and <i>Market Manuals</i>, including proposals that will result in an amendment to the <i>WESM Price Determination Methodology</i>; and adoption of new <i>Market Manuals</i>.</p> | <p>Proposals for changes, amendments, and modifications of the <i>WESM Rules</i> and <i>Market Manuals</i>, as well as the adoption of new <i>Market Manuals</i> shall be undertaken in accordance with the provisions of this chapter.</p> <p>This chapter 8 sets out:<br/>(a) The composition and manner of appointment of the <i>Rules Change Committee</i>;<br/>(b) The procedure for effecting a change to the <i>WESM Rules</i> and <i>Market Manuals</i>; and<br/>(c) The procedure for approval of a change to the <i>WESM Rules</i> and <i>Market Manuals</i>, including proposals that will result in an amendment to the <i>WESM Price Determination Methodology</i>; and adoption of new <i>Market Manuals</i>; <b><u>and</u></b>.<br/><b><u>(d) The procedure for amendment of the WESM</u></b></p> | <p>The WESM Rules already provide a structured process for amendments to the WESM Rules and Market Manuals under Chapter 8, particularly Section 8.4. However, the WESM Penalty Manual is a critical regulatory document, and its amendment process is not explicitly stated within Chapter 8. By clarifying that Section 8.4 also applies to the revision of the WESM Penalty Manual, the proposed change ensures consistency in the governance process for rule modifications.</p> <p>The proposed change explicitly recognizes</p> | <p><b><u>NGCP:</u></b></p> <p>Same as above</p> | <p><b><u>NGCP:</u></b></p> <p>The procedure for amendment of the WESM Penalty Provision, as provided under Section 8.4 being proposed by the Market Surveillance Committee.</p> | <p><i>See response in the general comment.</i></p> |              |



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| WESM RULES as of 05 November 2024 |                                                                                                                                          |                                                                                                                                                                          |                                                                                                                                               |                                                                                                                                                                                                                               |                                                                                                                                                                                                |                                                                  |                                             |              |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|---------------------------------------------|--------------|
| Title                             | Section                                                                                                                                  | Provision                                                                                                                                                                | Proposed Amendment                                                                                                                            | Rationale                                                                                                                                                                                                                     | Comments                                                                                                                                                                                       | Proposed Wording based on Comments                               | Original Proponent’s Response               | RCC Decision |
|                                   |                                                                                                                                          |                                                                                                                                                                          | <b><u>Penalty Provisions, as provided under Section 8.4, including proposals initiated by the Market Surveillance Committee (MSC).</u></b>    | the MSC’s role in initiating revisions, strengthening its ability to recommend adjustments based on market surveillance findings and enforcement experience.                                                                  |                                                                                                                                                                                                |                                                                  |                                             |              |
| Chapter 8 – Rule Change           | 8.4 – Consideration of Proposals to Change the WESM Rules or Market Manuals or to adopt new Market Manuals by the Rules Change Committee | Consideration of Proposals to Change the WESM Rules or Market Manuals or to adopt new Market Manuals by the Rules Change Committee<br><br><i>(Title of the Section).</i> | Consideration of Proposals to Change the WESM Rules or Market Manuals or to adopt new Market Manuals <del>by the Rules Change Committee</del> | To allow for flexibility in the rules which will allow MSC to refer to the considerations under this Clause in the review of the proposed amendments to the WESM Penalty Manual which is the responsibility of the Committee. | <b><u>NGCP:</u></b><br><br>From the authority granted to MSC, they are tasked to review or assess proposals to amend the WESM Rules.<br><br>The proposals should be first reviewed by the RCC. | <b><u>NGCP:</u></b><br><br>Please retain the original provision. | <i>See response in the general comment.</i> |              |



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| WESM RULES as of 05 November 2024                                                                                                                                       |                                                |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                              |                                                               |                                             |              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|---------------------------------------------|--------------|
| Title                                                                                                                                                                   | Section                                        | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Rationale                                                                                                                                                                                                                             | Comments                                                                                                                                                                                                                                                                                                                                     | Proposed Wording based on Comments                            | Original Proponent’s Response               | RCC Decision |
| Chapter 8 – Rule Change<br><br>8.4 – Consideration of Proposals to Change the WESM Rules or Market Manuals or to adopt new Market Manuals by the Rules Change Committee | 8.4.1 – Rules Change Classification Procedures | (NEW)     | <u>8.4.1.4 Subject to approval of the DOE for amendments related to Penalty provisions, the Market Surveillance Committee shall develop guidelines and procedures for matters related to the penalty mechanism. These guidelines and procedures will, as far as practicable, be consistent with the provisions of this Chapter 8, provided, however, that the Committee may establish procedures, time periods and manner of publication and effectivity other than as stated in this Chapter 8 depending on the classification of the proposed change.</u> | To introduce new provision that provides basis for the MSC to establish and develop guidelines and procedures for amendments related to the WESM Penalty Manual in view of its responsibility under Clause 7.2.5.5 of the WESM Rules. | <b>NGCP:</b><br><br>The provision under 7.2.5.5 limits the authority of the MSC to propose amendments.<br><br>Amendments or proposals to change the provisions of the WESM Penalty Manual should be coursed through the RCC and must be approved by the PEM Board.<br><br>Lastly, the proposals to amend the provisions of the WESM Rules or | <b>NGCP:</b><br><br>NGCP suggests omitting the new provision. | <i>See response in the general comment.</i> |              |



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| WESM RULES as of 05 November 2024                                                                                      |                                 |                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                   |                                                                                                                                                                      |                                                                                                                                                                                                |                                      |              |
|------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------|
| Title                                                                                                                  | Section                         | Provision                                                                                                                                                                                                                                   | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                     | Rationale                                                                                                         | Comments                                                                                                                                                             | Proposed Wording based on Comments                                                                                                                                                             | Original Proponent’s Response        | RCC Decision |
|                                                                                                                        |                                 |                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                   | the Penalty Manual should be approved by the DOE, while the PDM-related matters should be approved by ERC in accordance with Section 30 and Section 43 of the EPIRA. |                                                                                                                                                                                                |                                      |              |
| Chapter 8 – Rule Change<br><br>8.4 – Consideration of Proposals to Change the WESM Rules or Market Manuals or to adopt | 8.4.2 – Assessment of proposals | Pursuant to <i>WESM Rules</i> Clause 8.3.3 (b), the <i>Rules Change Committee</i> shall assess whether the proposed change to the <i>WESM Rules</i> or <i>Market Manual</i> , or the proposal for a new <i>Market Manual</i> is:<br><br>xxx | Pursuant to <i>WESM Rules</i> Clauses <b><u>1.6.2 (e) and</u></b> 8.3.3 (b), the <i>Rules Change Committee or the Market Surveillance Committee, for matters related to penalty provisions in the WESM</i> , shall assess whether the proposed change to the <i>WESM Rules</i> or <i>Market Manual</i> , or the proposal for a new <i>Market Manual</i> is:<br><br>xxx | To cover the responsibility of the MSC to review any proposed amendments related to penalties imposed in the WESM | <b>NGCP:</b><br><br>Same comments as above.<br><br>It grants the MSC authority overlapping with RCC                                                                  | <b>NGCP:</b><br><br>Pursuant to WESM Rules Clause 8.3.3 (b), the Rules Change Committee shall assess whether the proposed change to the WESM Penalty Manual, WESM Rules, Market Manual, or the | See response in the general comment. |              |



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Annex C – Matrix on the Consolidated Comments to the Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Market Surveillance Committee Processes

| WESM RULES as of 05 November 2024                                                                                                                                       |                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                   |                                                                                                                                                                                                                                                                         |                                                     |                                                                                                                                                                                                                     |              |
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| Title                                                                                                                                                                   | Section                                       | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Rationale                                                                                                         | Comments                                                                                                                                                                                                                                                                | Proposed Wording based on Comments                  | Original Proponent’s Response                                                                                                                                                                                       | RCC Decision |
| new Market Manuals by the Rules Change Committee                                                                                                                        |                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                   |                                                                                                                                                                                                                                                                         | proposal for a new Market Manual is:<br><br>X x x x |                                                                                                                                                                                                                     |              |
| Chapter 8 – Rule Change<br><br>8.4 – Consideration of Proposals to Change the WESM Rules or Market Manuals or to adopt new Market Manuals by the Rules Change Committee | 8.4.3 – Discretions when assessing a proposal | In considering whether a proposal for a change in the <i>WESM Rules</i> or a <i>Market Manual</i> , or for the adoption of a new <i>Market Manual</i> satisfies the criteria as set out in <i>WESM Rules</i> Clause 8.4.1, the <i>Rules Change Committee</i> may:<br><br>(a) Take into account any information and documents that the <i>Rules Change Committee</i> reasonably considers to be relevant to its consideration of the proposed change to the <i>WESM Rules</i> or | In considering whether a proposal for a change in the <i>WESM Rules</i> or a <i>Market Manual</i> , or for the adoption of a new <i>Market Manual</i> satisfies the criteria as set out in <i>WESM Rules</i> Clause 8.4.1, the <i>Rules Change Committee</i> <u>or the Market Surveillance Committee for matters related to Penalty Manual</u> may:<br><br>(a) Take into account any information and documents that the <del><i>Rules Change Committee</i></del> reasonably considers to be relevant to its consideration of the proposed change to the <i>WESM Rules</i> or | To cover the responsibility of the MSC to review any proposed amendments related to penalties imposed in the WESM | <u><b>APC</b></u><br><br><i>We respectfully seek clarification as to whether the MSC, in its process of amending the WESM Penalty Manual, is required to consider the nature of a proposed amendment, specifically, whether it is an urgent or a general amendment.</i> |                                                     | <i>Due to the sensitive nature of the penalty provisions, the MSC is of the position that penalties should never be subject of urgent amendments and be carefully reviewed as it will financially impact market</i> |              |



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| WESM RULES as of 05 November 2024 |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |           |                                                                                                                                                                                                                                                                                                                            |                                    |                                                                                        |              |
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| Title                             | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Rationale | Comments                                                                                                                                                                                                                                                                                                                   | Proposed Wording based on Comments | Original Proponent’s Response                                                          | RCC Decision |
|                                   |         | <p><i>Market Manual</i> or the proposed new <i>Market Manual</i>;</p> <p>(b) Consult with such persons whom the <i>Rules Change Committee</i> reasonably considers will likely be affected by the proposal;</p> <p>(c) Seek such information and views from any person as may be practicable under the circumstances; and</p> <p>(d) Refer and delegate the proposal to any working group, comprised of persons having such expertise as the <i>Committee</i>, in the <i>Rules Change Committee’s</i> absolute discretion, whenever it considers reasonable or necessary or as it may consider practicable in the circumstances delegating to that working group any</p> | <p><i>Market Manual</i> or the proposed new <i>Market Manual</i>;</p> <p>(b) Consult with such persons whom the <del><i>Rules Change Committee</i></del> reasonably considers will likely be affected by the proposal;</p> <p>(c) Seek such information and views from any person as may be practicable under the circumstances; and</p> <p>(d) Refer and delegate the proposal to any working group, comprised of persons having such expertise as the <del><i>Committee</i></del>, in the <del><i>Rules Change Committee’s</i></del> absolute discretion, whenever it considers reasonable or necessary or as it may consider practicable in the</p> |           | <p><i>Should this be the case, it is imperative that the amendment process for the Penalty Manual gives due consideration to the different timelines associated with urgent and general amendments, particularly for proposals that extensively impact the Penalty Manual’s provisions.</i></p> <p><b><u>NGCP:</u></b></p> |                                    | <p><i>participants. Hence, only general amendment will be accepted by the MSC.</i></p> |              |



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| WESM RULES as of 05 November 2024 |         |                                                                                                                                                                       |                                                                                                                                                                                                                          |           |                                                                                                                                                                                                                                                                                                               |                                                |                                             |              |
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| Title                             | Section | Provision                                                                                                                                                             | Proposed Amendment                                                                                                                                                                                                       | Rationale | Comments                                                                                                                                                                                                                                                                                                      | Proposed Wording based on Comments             | Original Proponent’s Response               | RCC Decision |
|                                   |         | obligation or task of the <i>Rules Change Committee</i> as set out in <i>WESM Rules</i> Clauses 8.4.3 , and 8.4.5 other than this <i>WESM Rules</i> Clause 8.4.3 (d). | circumstances delegating to that working group any obligation or task of the <i>Rules Change Committee</i> as set out in <i>WESM Rules</i> Clauses 8.4.3 , and 8.4.5 other than this <i>WESM Rules</i> Clause 8.4.3 (d). |           | Rules change is also within the authority of the RCC and not MSC. The authority of MSC is recommendatory.<br><br>8.4.3 (d) Should be reworded disallowing the delegation of proposals to any working group. Rather, the RCC should only seek assistance from other committees in the review of the proposals. | We recommend retaining the original provision. | <i>See response in the general comment.</i> |              |





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| WESM RULES as of 05 November 2024                                                                                                        |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                              |          |                                    |                               |              |
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| Title                                                                                                                                    | Section          | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Rationale                                                    | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| 8.4 – Consideration of Proposals to Change the WESM Rules or Market Manuals or to adopt new Market Manuals by the Rules Change Committee | satisfy criteria | as set out in <i>WESM Rules</i> Clause 8.4.2, the <i>Rules Change Committee</i> shall:<br><br>(a) Notify the <i>PEM Board</i> , all <i>WESM Members</i> and all other interested parties of the proposal; and<br><br>(b) Invite such parties to make written submissions regarding the proposal within the next 30 <i>working days</i> after publication of the proposed change to the <i>WESM Rules</i> or <i>Market Manual</i> , or new <i>Market Manual</i> in the market information website. | as set out in <i>WESM Rules</i> Clause 8.4.2, the <i>Rules Change Committee</i> shall:<br><br>(a) Notify the <i>PEM Board</i> , all <i>WESM Members</i> and all other interested parties of the proposal; and<br><br>(b) Invite such parties to make written submissions regarding the proposal within the next 30 <i>working days</i> after publication of the proposed change to the <i>WESM Rules</i> or <i>Market Manual</i> , or new <i>Market Manual</i> in the market information website.<br><br><u><b>If the <i>Market Surveillance Committee</i> concludes that a proposal satisfies the criteria as set out in <i>WESM Rules</i> Clause 8.4.1.1 (b) and (c) and <i>WESM Penalty Manual</i> Section 7.1.2, the</b></u> | proposed amendments related to penalties imposed in the WESM |          |                                    |                               |              |



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| WESM RULES as of 05 November 2024                               |                                                      |                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                   |          |                                    |                               |              |
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| Title                                                           | Section                                              | Provision                                                                                                                                                                                                                               | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                      | Rationale                                                                                                         | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                                                 |                                                      |                                                                                                                                                                                                                                         | <p><u><b>Market Surveillance Committee shall:</b></u></p> <p><u><b>(a) Notify all WESM Members and all other interested parties of the proposal; and</b></u></p> <p><u><b>(b) Invite such parties to make written submissions regarding the proposal within the next 30 working days after publication of the proposed change to the WESM Penalty Manual in the market information website.</b></u></p> |                                                                                                                   |          |                                    |                               |              |
| Chapter 8 – Rule Change<br><br>8.4 – Consideration of Proposals | 8.4.6 – Submission s regarding proposed Rules Change | To be validly considered, a written submission made in response to a proposed change to the <i>WESM Rules, Market Manual</i> , or proposal for the adoption of a new <i>Market Manual</i> , as provided under Clause 8.4.5 (b), must be | To be validly considered, a written submission made in response to a proposed change to the <i>WESM Rules, Market Manual</i> , or proposal for the adoption of a new <i>Market Manual</i> , as provided under Clause 8.4.5 (b), must be                                                                                                                                                                 | To cover the responsibility of the MSC to review any proposed amendments related to penalties imposed in the WESM |          |                                    |                               |              |



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| WESM RULES as of 05 November 2024                                                                              |                               |                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                   |                                                                                                                                                                                                       |                                                                                                                                                                                                          |                                                                                                                                         |              |
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| Title                                                                                                          | Section                       | Provision                                                                                                                                                                                                                                                                                                                     | Proposed Amendment                                                                                                                                                                                                                                                                                                                                     | Rationale                                                                                                         | Comments                                                                                                                                                                                              | Proposed Wording based on Comments                                                                                                                                                                       | Original Proponent’s Response                                                                                                           | RCC Decision |
| to Change the WESM Rules or Market Manuals or to adopt new Market Manuals by the Rules Change Committee        |                               | received by the <i>Rules Change Committee</i> no later than 30 <i>working days</i> after the notice and invitation referred to in <i>WESM Rules</i> Clauses 8.4.5 (a) and (b) are issued.                                                                                                                                     | received by the <i>Rules Change Committee <u>or the Market Surveillance Committee for matters related to Penalty Provision</u></i> , no later than 30 <i>working days</i> after the notice and invitation referred to in <i>WESM Rules</i> Clauses 8.4.5 <del>(a) and (b)</del> are issued.                                                            |                                                                                                                   |                                                                                                                                                                                                       |                                                                                                                                                                                                          |                                                                                                                                         |              |
| Chapter 8 – Rule Change<br><br>8.4 – Considerati on of Proposals to Change the WESM Rules or Market Manuals or | 8.4.7 – Approval of proposals | If the <i>Rules Change Committee</i> , upon deliberation of the proposal and having considered all valid submissions, concludes that it is necessary or desirable to give effect to the proposed change to the <i>WESM Rules</i> or the <i>Market Manual</i> , or adoption of new <i>Market Manual</i> , then it shall submit | If the <i>Rules Change Committee <u>or the Market Surveillance Committee for matters related to Penalty Provision</u></i> , upon deliberation of the proposal and having considered all valid submissions, concludes that it is necessary or desirable to give effect to the proposed change to the <i>WESM Rules</i> or the <i>Market Manual</i> , or | To cover the responsibility of the MSC to review any proposed amendments related to penalties imposed in the WESM | <u>APC</u><br><br><i>It is proposed that, prior to the direct transmittal of amendments pertaining to the WESM Penalty Manual to the DOE, a reconciliation of such amendments shall be undertaken</i> | <u>APC</u><br><br>If the <i>Rules Change Committee or the Market Surveillance Committee for matters related to Penalty Provision</i> , upon deliberation of the proposal and having considered all valid | <i>For APC: Under the WESM Penalty Manual Section 7.1.3, the MSC shall conduct consultation with Rules Change Committee, PEM Board,</i> |              |



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| WESM RULES as of 05 November 2024                         |         |                                                     |                                                                                                                                                                                      |           |                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                           |              |
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| Title                                                     | Section | Provision                                           | Proposed Amendment                                                                                                                                                                   | Rationale | Comments                                                                                                                                                                                                                                                                         | Proposed Wording based on Comments                                                                                                                                                                                                                                                                                                                                                         | Original Proponent’s Response                                                                                                                                             | RCC Decision |
| to adopt new Market Manuals by the Rules Change Committee |         | said proposal to the <i>PEM Board</i> for approval. | adoption of new <i>Market Manual</i> , then it shall submit said proposal to the <i>PEM Board</i> <b><u>or directly to DOE for amendments to Penalty Provision</u></b> for approval. |           | <i>by the President of the WGA.</i><br><br><i>The purpose of this proposed mechanism is to ensure that the submissions from the MSC, if applicable, are fully aligned with the market developments and rule changes that have been observed and deliberated upon by the RCC.</i> | submissions, concludes that it is necessary or desirable to give effect to the proposed change to the <i>WESM Rules</i> or the <i>Market Manual</i> , or adoption of new <i>Market Manual</i> , then it shall submit said proposal to the <i>PEM Board</i> or directly to DOE for amendments to Penalty Provision, <b><u>upon the endorsement of the WGA President</u></b> , for approval. | <i>and the WESM Members to solicit comments. In addition, the WGA President as the WESM Governance Officer will be informed of any endorsement of the MSC to the DOE.</i> |              |



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| WESM RULES as of 05 November 2024 |         |           |                    |           |                                                                                                                                                                                                                                                                                                                                                      |                                    |                                                                            |              |
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| Title                             | Section | Provision | Proposed Amendment | Rationale | Comments                                                                                                                                                                                                                                                                                                                                             | Proposed Wording based on Comments | Original Proponent’s Response                                              | RCC Decision |
|                                   |         |           |                    |           | <p><b><u>NGCP:</u></b></p> <p>Suggest to reject<br/>The proposals must first be reviewed and evaluated by the PEM Board.</p> <p>Further, it is the PEM Board who should submit the proposals to the DOE for its approval.</p> <p>To allow the Committees to submit the proposals directly to DOE would be effectively granting the Committee the</p> |                                    | <p><i>For NGCP:</i></p> <p><i>See response in the general comment.</i></p> |              |



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| WESM RULES as of 05 November 2024                                                                                                     |                                    |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   |                                                                                               |                                    |                                      |              |
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| Title                                                                                                                                 | Section                            | Provision                                                                                                                                                                                                                                                                                                                                                                                                     | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Rationale                                                                                                         | Comments                                                                                      | Proposed Wording based on Comments | Original Proponent’s Response        | RCC Decision |
|                                                                                                                                       |                                    |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   | same authority as the PEM Board which can act on its own without approval from the PEM Board. |                                    |                                      |              |
| Chapter 8 – Rule Change<br><br>8.6 – Approval of Proposal for Changes to the WESM Rules or Market Manuals or adopt new Market Manuals | 8.6.1 – DOE assessment of proposal | If the <i>PEM Board</i> submits a proposal to the <i>DOE</i> for <i>DOE’s</i> final approval of any changes to the <i>WESM Rules</i> or <i>Market Manuals</i> , or adoption of a new <i>Market Manual</i> , in accordance with the <i>WESM Rules</i> Clause 8.5.4, the <i>DOE</i> shall assess whether the proposed change to the <i>WESM Rules</i> satisfies the criteria which are set out in Clause 8.4.2. | If the <i>PEM Board</i> <u><b>or Market Surveillance Committee for amendments related to Penalty provision</b></u> submits a proposal to the <i>DOE</i> for <i>DOE’s</i> final approval of any changes to the <i>WESM Rules</i> or <i>Market Manuals</i> , or adoption of a new <i>Market Manual</i> , in accordance with the <i>WESM Rules</i> Clause 8.5.4, the <i>DOE</i> shall assess whether the proposed change to the <i>WESM Rules</i> satisfies the criteria which are set out in Clause 8.4.2. | To cover the responsibility of the MSC to review any proposed amendments related to penalties imposed in the WESM | <u><b>NGCP:</b></u><br><br>Same as above                                                      |                                    | See response in the general comment. |              |



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| WESM RULES as of 05 November 2024                                                                                                     |                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                   |          |                                    |                               |              |
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| Title                                                                                                                                 | Section                                                    | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                 | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Rationale                                                                                                         | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| Chapter 8 – Rule Change<br><br>8.6 – Approval of Proposal for Changes to the WESM Rules or Market Manuals or adopt new Market Manuals | 8.6.3 – Notification following failure to satisfy criteria | If the <i>DOE</i> concludes that a proposal does not satisfy the criteria, which are set out in <i>WESM Rules</i> Clause 8.4.2, the <i>DOE</i> , shall notify:<br><br>(a) The <i>PEM Board</i> ;<br><br>(b) The <i>Rules Change Committee</i> ; and<br><br>(c) The person who proposed the change to the <i>WESM Rules</i> ,<br><br>within 10 <i>working days</i> of reaching that conclusion and shall provide reasons for its decision. | If the <i>DOE</i> concludes that a proposal does not satisfy the criteria, which are set out in <i>WESM Rules</i> Clause 8.4.2, the <i>DOE</i> , shall notify:<br><br>(a) The <i>PEM Board</i> <u><b>and the Rules Change Committee for amendments to WESM Rules and Market Manuals;</b></u><br>(b) The Rules Change Committee <u><b>Market Surveillance Committee for amendments related to Penalty Manual;</b></u> and<br>(c) The person who proposed the change to the <i>WESM Rules</i> ,<br><br>within 10 <i>working days</i> of reaching that conclusion and shall provide reasons for its decision. | To cover the responsibility of the MSC to review any proposed amendments related to penalties imposed in the WESM |          |                                    |                               |              |



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| WESM RULES as of 05 November 2024 |                                        |                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                   |          |                                    |                               |              |
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| Title                             | Section                                | Provision                                                                                                                                                                                                                                                                                     | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                   | Rationale                                                                                                         | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| Chapter 8 – Rule Change           | 8.7 – Rules Change Committee Indemnity | <b>8.7 RULES CHANGE COMMITTEE INDEMNITY</b><br><br>The <i>Rules Change Committee</i> and its members, and any working group to whom any task or obligation is delegated under Clause 8.4, are not to be personally liable in any way for any change, which is made to the <i>WESM Rules</i> . | <b>8.7 RULES CHANGE COMMITTEE AND MARKET SURVEILLANCE COMMITTEE INDEMNITY</b><br><br>The <i>Rules Change Committee or the Market Surveillance Committee</i> and its members, and any working group to whom any task or obligation is delegated under Clause 8.4, are not to be personally liable in any way for any change, which is made to the <i>WESM Rules</i> . | To cover the responsibility of the MSC to review any proposed amendments related to penalties imposed in the WESM |          |                                    |                               |              |



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| WESM Manual on Market Surveillance Issue 2.0 |             |                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                     |          |                                    |                               |              |
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| Title                                        | Section     | Provision                                                                                                                                                                                                                                                                                             | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                           | Rationale                                                                                                                                           | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| Section 1 – Introduction<br><br>1.1 Purpose  | 1.1.1       | This Manual establishes the principles of the <i>WESM Rules</i> and <i>Retail Rules</i> on market monitoring, assessment and surveillance. The same also provides the procedures for the conduct of activities related to market monitoring, assessment and surveillance to implement the said rules. | This Manual establishes the principles of the <i>WESM Rules</i> and <i>Retail Rules</i> on market monitoring, assessment and surveillance. The same also provides the procedures for the conduct of activities related to market monitoring, assessment and surveillance to implement the said rules, <b><u>and the review of proposed amendments to the WESM Penalty Manual in accordance with the Clauses 1.6.2 (e) and 7.2.5.5 of the WESM Rules.</u></b> | To reflect the responsibility of the MSC to review any proposed amendments to the WESM Penalty Manual pursuant to Clause 7.2.5.5 of the WESM Rules. |          |                                    |                               |              |
| Section 1 – Introduction                     | 1.2 – Scope | This Manual covers all related procedures and activities concerning market monitoring, assessment and surveillance as follows:                                                                                                                                                                        | This Manual covers all related procedures and activities concerning market monitoring, assessment and surveillance, <b><u>and review of proposed amendments to the WESM Penalty Manual</u></b> as follows:                                                                                                                                                                                                                                                   | To reflect the responsibility of the MSC to review any proposed amendments to the WESM Penalty Manual pursuant to                                   |          |                                    |                               |              |



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Annex C – Matrix on the Consolidated Comments to the Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Market Surveillance Committee Processes

| WESM Manual on Market Surveillance Issue 2.0             |                           |                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                      |                                                                                                   |          |                                    |                               |              |
|----------------------------------------------------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|----------|------------------------------------|-------------------------------|--------------|
| Title                                                    | Section                   | Provision                                                                                                                                                                                                                                                 | Proposed Amendment                                                                                                                                                                                                                                                   | Rationale                                                                                         | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                                          |                           | (a) All activities and procedures, including the functions, authority and reports of the Market Surveillance Committee, Enforcement and Compliance Office and the Market Assessment Group; and<br>(b) Rules on access to information and data management. | (a) All activities and procedures, including the functions, authority and reports of the Market Surveillance Committee, <del>Enforcement and Compliance Office</del> and the Market Assessment Group; and<br>(b) Rules on access to information and data management. | Clause 7.2.5.5 of the WESM Rules.                                                                 |          |                                    |                               |              |
| Section 2 – Definition, Interpretation, and Construction | 2.1 – Definition of terms | xxx<br><br><b>Market Assessment Report</b> means the periodic report prepared by the <i>Market Assessment Group</i> and submitted to the <i>Market Surveillance Committee</i> .<br><br>xxx                                                                | xxx<br><br><b>Market Assessment Report</b> means the periodic report <b><u>for Wholesale and Retail electricity markets</u></b> prepared by the <i>Market Assessment Group</i> and submitted to the <i>Market Surveillance Committee</i> .<br><br>xxx                | To reflect that the assessment reports include both the Wholesale and Retail Electricity markets. |          |                                    |                               |              |





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| Title                                        | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                             | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Rationale                             | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         | <p>xxx</p> <p><b>Review Document on Over-Riding Constraints</b> means the report prepared by the <i>Market Surveillance Committee</i> in accordance with Section 5.5 of this Manual.</p> <p>xxx</p> <p><b>Review Report</b> means the report prepared by the <i>Market Surveillance Committee</i> and submitted to the <i>PEM Board</i> in accordance with Section 5.7 of this Manual.</p> <p>xxx</p> | <p><u>during the covered period including the approved market reports.</u></p> <p>xxx</p> <p><del>Review Document on Over-Riding Constraints</del> <b><u>Report</u></b> means the report prepared by the <i>Market Surveillance Committee</i> in accordance with Section 5.5 of this Manual.</p> <p>xxx</p> <p><b><u>Review Report on Market Intervention / Suspension</u></b> means the report prepared by the <i>Market Surveillance Committee</i> and submitted to the <i>PEM Board</i> in accordance with Section 5.7<u>3</u> of this Manual.</p> | <p>To update reference provision.</p> |          |                                    |                               |              |



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| Title                                        | Section                             | Provision                                                                                                                                                                                                                                                                                                                                                                                                                            | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Rationale                                                                                                                                                                                                                                                                                                                                                                                       | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                      | xxx                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                 |          |                                    |                               |              |
| Section 3 – Responsibilities                 | 3.1 – Market Surveillance Committee | <p>In accordance with the <i>WESM Rules</i>, the <i>Market Surveillance Committee</i> shall have the following responsibilities:</p> <p>xxx</p> <p>(b) Prepare and Submit Monthly Monitoring Reports, Quarterly Retail Market Monitoring Reports, Annual Reports to the <i>PEM Board</i>, the <i>DOE</i> and the <i>ERC</i>, as the case may be, as required under this <i>Market Manual</i>, which shall include the following:</p> | <p>In accordance with the <i>WESM Rules</i>, the <i>Market Surveillance Committee</i> shall have the following responsibilities:</p> <p>xxx</p> <p>(b) Prepare and Submit <del>Monthly Monitoring Reports, Quarterly Retail Market Monitoring Reports, Annual Reports to the <i>PEM Board</i>, the <i>DOE</i> and the <i>ERC</i>, as the case, <u>which</u> may be, as required under this <i>Market Manual</i>, <u>the Quarterly Monitoring Reports, Quarterly Market Reports covering three (3) billing periods, and Annual Market Reports covering the</u></del></p> | <p>It is proposed shifting from monthly to quarterly monitoring to enhance the depth and accuracy of market assessments. This change will allow us to:</p> <ul style="list-style-type: none"><li>Conduct More Detailed Assessments: By covering longer periods, we can perform more comprehensive analyses, leading to more accurate and insightful evaluations of market conditions.</li></ul> |          |                                    |                               |              |



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| Title                                        | Section | Provision                                                                                                                                                                                                                                                                           | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                          | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         | <p>(i) Market Assessment Report;<br/>(ii) Retail Market Assessment Report;<br/>(iii) Over-riding Constraints Report; and<br/>(iv) Apparent or suspected incidents of <i>anti-competitive behavior</i> or abuse of market power by any <i>WESM Participant/Member</i></p> <p>xxx</p> | <p><b><u>January to December billing period, including the last quarter, for the Wholesale and Retail electricity markets,</u></b> which shall include the following:</p> <p><del>(i) Market Assessment Report;<br/>(ii) Retail Market Assessment Report;<br/>(iii) Over-riding Constraints Report; and<br/>(iv) Apparent or suspected incidents of <i>anti-competitive behavior</i> or abuse of market power by any <i>WESM Participant/Member</i></del></p> <p><b><u>The Committee shall publish Monthly Market Statistics that include the results of the monitoring indices specified in the Catalogue of Market Monitoring Data and</u></b></p> | <ul style="list-style-type: none"><li>Identify Trends: Quarterly monitoring will enable us to better identify and understand market trends, which may not be as apparent in shorter, monthly reports.</li><li>Resource Optimization: Focusing on quarterly reports will allow us to allocate resources more efficiently, ensuring that our analyses are thorough and well supported.</li></ul> <p>Additionally, to address any specific market</p> |          |                                    |                               |              |



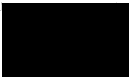
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| Title                                        | Section                             | Provision | Proposed Amendment                                                                                                                                                                                                                                                     | Rationale                                                                                                                                                                                                                                                       | Comments                                                                                                                | Proposed Wording based on Comments                                                                                                                                             | Original Proponent’s Response                                                               | RCC Decision |
|                                              |                                     |           | <u>Indices (CMMDI) and Catalogue of Retail Market Monitoring Data and Indices (CRMMDI).</u><br><br>xxx                                                                                                                                                                 | issues or developments, we retain the discretion to submit monthly reports or special reports as necessary. This flexibility ensures that we can respond promptly to any emerging concerns or significant changes in the market.                                |                                                                                                                         |                                                                                                                                                                                |                                                                                             |              |
| Section 3 – Responsibilities                 | 3.1 – Market Surveillance Committee | (NEW)     | <u>(c) In the conduct of its market surveillance function, recommend to PEMC President the issuance of Notice of Possible Commission of Anti-competitive Behavior for any apparent or suspected incidents of anti-competitive behavior or abuse of market power by</u> | In view of the revisions to Section 3.1(b), a separate provision is introduced to specify the responsibility of the MSC in addressing any observed or suspected incidents of anti-competitive behavior or abuse of market power by any WESM Participant/Member. | <b>APC</b><br><br>We suggest to change PEMC to WGA for consistency.<br><br>We would like to request for a clarification | <u>(c) In the conduct of its market surveillance function, recommend to WGA the issuance of Notice of Possible Commission of Anti-competitive Behavior for any apparent or</u> | The MSC is amenable to the change from PEMC to WGA.<br><br>Market Surveillance Manual Issue |              |





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| Title                                        | Section | Provision | Proposed Amendment | Rationale | Comments                                                                                                          | Proposed Wording based on Comments | Original Proponent’s Response                                                                                                                                                                                                                                           | RCC Decision |
|                                              |         |           |                    |           | Participants, and if the investigation and enforcement of such rules fall within the explicit purview of the MSC. |                                    | preventive or mitigation measures, when necessary. It is with the jurisdiction of the ERC to determine whether the reported act is an actual ACB.<br><br>In terms of the interface of the PCC regarding ACB in the electricity industry, the ERC and PCC entered into a |              |



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| Title                                        | Section | Provision | Proposed Amendment | Rationale | Comments | Proposed Wording based on Comments | Original Proponent’s Response                                                                                                                                                                                                                                       | RCC Decision |
|                                              |         |           |                    |           |          |                                    | MOA <sup>6</sup> in June 2019 which clarified the cooperation of the two (2) agencies on the notification of the matters, investigation and enforcement support, conduct of joint task force, consultative meetings, and other related to the investigation of ACB. |              |

<sup>6</sup> <https://www.phcc.gov.ph/resource-details/memorandum-of-agreement-philippine-competition-commission-and-energy-regulatory-commission>



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| Title                                        | Section | Provision | Proposed Amendment | Rationale | Comments                                                                                                                                                                                                                                                                                                                                                 | Proposed Wording based on Comments | Original Proponent’s Response                                                                         | RCC Decision |
|                                              |         |           |                    |           | In the event that no such comprehensive and applicable rules have been established, it is hereby proposed that a detailed and authoritative framework be developed. This framework shall establish the precise parameters and criteria required to empower the MSC to effectively conduct investigations into anti-competitive behavior and market power |                                    | This is noted. The MSC will consider the suggestion in the future activities of the Committee on ACB. |              |



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| Title                                        | Section | Provision | Proposed Amendment | Rationale | Comments                                                                                                                                                                                                                                                                                                                                                       | Proposed Wording based on Comments | Original Proponent’s Response                                                                                                 | RCC Decision |
|                                              |         |           |                    |           | <p><i>abuse. This will also enable for the WESM Participants to be guided on the anti-competitive behavior and market power abuse.</i></p> <p><b><u>MEI/PEI</u></b></p> <p><i>Please clarify how this proposed new MSC responsibility will not encroach into the mandate of ERC on the monitoring and imposition of penalties in cases of market power</i></p> |                                    | <p><i>The MSC’s responsibility to report apparent or suspected ACB in the WESM was already reflected in the currently</i></p> |              |



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| Title                                        | Section | Provision | Proposed Amendment | Rationale | Comments                                                                                                                                                                                                                                                                                        | Proposed Wording based on Comments | Original Proponent’s Response                                                                                                                                                                                                                                        | RCC Decision |
|                                              |         |           |                    |           | abuse and anti-competitive behavior, as provided in the EPIRA, specifically Section 45 which states in part: “The ERC shall, motu proprio, monitor and penalize any market power abuse or anti-competitive or discriminatory act or behavior by any participant in the electric power industry” |                                    | approved Market Surveillance Manual, specifically under Section 3.1(b)(iv). The proposed amendment seeks to distinguish this responsibility from the MSC’s periodic reporting obligations, such as monthly or quarterly market assessments. A new provision has been |              |



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| Title                                        | Section                             | Provision                                                                                                                                        | Proposed Amendment                                                                                                                                                       | Rationale                                                                                          | Comments | Proposed Wording based on Comments | Original Proponent’s Response                                                                                                                                                             | RCC Decision |
|                                              |                                     |                                                                                                                                                  |                                                                                                                                                                          |                                                                                                    |          |                                    | <i>introduced to clarify that the submission of ACB-related reports is event-driven—triggered by the occurrence of an incident—rather than being part of the regular reporting cycle.</i> |              |
| Section 3 – Responsibilities                 | 3.1 – Market Surveillance Committee | xxx<br><br>(d) Review an event of <i>market intervention</i> or <i>market suspension</i> , as defined under Chapter 6 of the <i>WESM Rules</i> , | xxx<br><br>( <u>e</u> ) <del>(d)</del> Review an event of <i>market intervention</i> or <i>market suspension</i> , as defined under Chapter 6 of the <i>WESM Rules</i> , | To reflect the appropriate name of the report and to distinguish it from the report/s submitted by |          |                                    |                                                                                                                                                                                           |              |





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| Title                                        | Section | Provision                                                                                                                                                                                | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                              | Rationale                                                                                                                                                                                                                                                                                                                                                                                                             | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         | necessity of the amendment proposal;<br><br>(g) Annually review and propose changes, as appropriate, to the <i>WESM Penalty Manual</i> pursuant to Clause 7.2 of the <i>WESM Rules</i> . | necessity of the amendment proposal;<br><br><u>(h) (g) Annually review, and propose changes, as appropriate, and review any proposed amendments to the <i>WESM Penalty Manual</i> pursuant to Clause 7.2.5.5 of the <i>WESM Rules</i>;</u><br><br><u>(i) Submit a Request for Investigation (RFI) whenever the Committee has information on acts or omissions which may possibly constitute to a breach of the <i>WESM Rules</i> and <i>WESM Manuals</i> in</u> | To update the reference Clause, for clarity.<br><br>To reflect the responsibility of the MSC to review any proposed amendments to the <i>WESM Penalty Manual</i> pursuant to Clause 7.2.5.5 of the <i>WESM Rules</i> .<br><br>To include that in the performance of its monitoring functions the MSC have observed any acts or breaches to the <i>WESM Rules</i> and <i>Market manuals</i> , the Committee may submit |          |                                    |                               |              |



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| Title                                        | Section                       | Provision                                                                                                                                                                                                                                                                                                                                                                                 | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Rationale                                         | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |                               |                                                                                                                                                                                                                                                                                                                                                                                           | <u>accordance with Section 4.6.2 of the Enforcement and Compliance Manual.</u>                                                                                                                                                                                                                                                                                                                                                                                           | a RFI to ECO for further assessment / evaluation. |          |                                    |                               |              |
| Section 3 – Responsibilities                 | 3.3 – Market Assessment Group | <p>In accordance with the <i>WESM Rules</i>, the <i>Market Assessment Group</i> shall, among others, have the following authorities and responsibilities:</p> <p>xxx</p> <p>(h) Maintain a record of each incident leading to an Over-Riding Constraint and provide the Market Surveillance Committee a summary of said incidents during its periodic monitoring meetings;</p> <p>xxx</p> | <p>In accordance with the <i>WESM Rules</i>, the <i>Market Assessment Group</i> shall, among others, have the following authorities and responsibilities:</p> <p>xxx</p> <p>(h) Maintain a record of each incident leading to an Over-Riding Constraint and provide the Market Surveillance Committee a summary of said incidents during its periodic monitoring meetings;</p> <p>xxx</p> <p><u>(k) Provide preliminary assessment on submitted proposed general</u></p> |                                                   |          |                                    |                               |              |



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| Title                                        | Section                                | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                     | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Rationale                                                                                                                                                 | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                               | <u>amendments to the WESM Penalty Manual.</u>                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                           |          |                                    |                               |              |
| Section 3 – Responsibilities                 | 3.6 – Other WESM Governance Committees | <p>In accordance with the WESM Rules, the other <i>WESM Governance Committees</i> shall, among others, have the following responsibilities:</p> <p>(a) Notify the <i>Market Surveillance Committee</i> whenever they have knowledge of acts or omissions which may possibly constitute to a Breach of the <i>WESM Rules</i> and WESM Manuals;</p> <p>(b) Notify the <i>Market Surveillance Committee</i> when they have knowledge of acts</p> | <p>In accordance with the WESM Rules, the other <i>WESM Governance Committees</i> shall, among others, have the following responsibilities:</p> <p><del>(a) Notify the <i>Market Surveillance Committee</i> whenever they have knowledge of acts or omissions which may possibly constitute to a Breach of the <i>WESM Rules</i> and WESM Manuals;</del></p> <p><del>(a)</del> (b) Notify the <i>Market Surveillance Committee</i> when they have knowledge of acts</p> | <p>The responsibility related to the Breach of the WESM Rules and Market Manuals was transferred to the Compliance Committee (CC).</p> <p>Renumbering</p> |          |                                    |                               |              |



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| Title                                        | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                                            | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Rationale                                                                                                                                                                                                                          | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         | or omissions constituting possible abuse of market power or anti-competitive behavior.<br><br>(c) Provide assistance and technical expertise to other <i>WESM Governance Committees</i> when so requested; and<br><br>(d) Promptly provide all data, information, reports and other documentation requested by <i>DOE, ERC, PEM Board, WESM Governance Committees, Market Assessment Group or Enforcement and Compliance Office.</i> | or omissions constituting possible abuse of market power or anti-competitive behavior.<br><br>(c) Provide assistance and technical expertise to the <del>other</del> <u><i>WESM Governance Market Surveillance Committees</i></u> when so requested; and<br><br>(d) Promptly provide all data, information, reports and other documentation requested by <i>DOE, ERC, PEM Board, WESM Governance Committees, <u>or</u> Market Assessment Group <del>or Enforcement and Compliance Office.</del></i> | To clearly indicate the other WGCs’ assistance to the MSC pursuant to its mandate under the WESM Rules and Market Surveillance Manual.<br><br>Removal of ECO since the enforcement functions of the MSC were transferred to the CC |          |                                    |                               |              |



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| WESM Manual on Market Surveillance Issue 2.0                 |                                     |                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                        |          |                                    |                               |              |
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| Title                                                        | Section                             | Provision                                                                                                                                                                                                                                                                                                                                                         | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                           | Rationale                                                                                                                                                                                                                                              | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| Section 3 – Responsibilities                                 | 3.7 – WESM Members and Participants | Whenever required by the <i>Market Surveillance Committee</i> , the <i>Enforcement and Compliance Office</i> or <i>Market Assessment Group</i> , a WESM Member shall timely submit requested information and data and documents to enable the <i>Market Surveillance Committee</i> to effectively carry out its functions and responsibilities under this Manual. | Whenever required by the <i>Market Surveillance Committee</i> , the <del><i>Enforcement and Compliance Office</i></del> or <i>Market Assessment Group</i> , a WESM Member shall timely submit requested information and data and documents to enable the <i>Market Surveillance Committee</i> to effectively carry out its functions and responsibilities under this Manual. | Removal of ECO since the enforcement functions of the MSC were transferred to the CC.                                                                                                                                                                  |          |                                    |                               |              |
| Section 4 – Market Monitoring<br><br>4.1 – Market Assessment | 4.1.1                               | The Market Assessment Group shall prepare monthly and annual Market Assessment Reports for submission to the <i>Market Surveillance Committee</i> , which shall include:<br><br>xxx                                                                                                                                                                               | The Market Assessment Group shall prepare <del>monthly</del> , <u>quarterly</u> and annual Market Assessment Reports for submission to the Market Surveillance Committee, which shall include:<br><br>xxx                                                                                                                                                                    | It is being proposed shifting from monthly to quarterly monitoring to enhance the depth and accuracy of market assessments. This change will allow us to:<br><br><ul style="list-style-type: none"><li>Conduct More Detailed Assessments: By</li></ul> |          |                                    |                               |              |



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| Title                                        | Section | Provision | Proposed Amendment | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                               | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         |           |                    | <div>covering longer periods, we can perform more comprehensive analyses, leading to more accurate and insightful evaluations of market conditions.</div> <ul style="list-style-type: none"><li>Identify Trends: Quarterly monitoring will enable us to better identify and understand market trends, which may not be as apparent in shorter, monthly reports.</li><li>Resource Optimization: Focusing on quarterly reports will allow us to</li></ul> |          |                                    |                               |              |



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| Title                                                        | Section | Provision                                                                                                                                                                                 | Proposed Amendment                                                                                                                                                                                                        | Rationale                                                                                                                                                                                                               | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                                              |         |                                                                                                                                                                                           |                                                                                                                                                                                                                           | allocate resources more efficiently, ensuring that our analyses are thorough and well supported.                                                                                                                        |          |                                    |                               |              |
| Section 4 – Market Monitoring<br><br>4.1 – Market Assessment | 4.1.3   | (NEW)                                                                                                                                                                                     | <b><u>4.1.3 The Market Assessment Group shall maintain a record of its monitoring and assessment and provide the Market Surveillance Committee a summary of observations during its periodic monitoring meetings.</u></b> | To ensure that the Committee will be updated on the actual condition of the market and if there’s any issues or notable observations that require immediate action, MAG shall continue to present in periodic meetings. |          |                                    |                               |              |
| Section 4 – Market Monitoring                                | 4.1.3   | 4.1.3 The <i>Market Surveillance Committee</i> shall review and prepare periodic reports for submission to the <i>PEM Board</i> , the <i>DOE</i> and the <i>ERC</i> , as the case may be. | 4.1.3 <b><u>4.1.4</u></b> The <i>Market Surveillance Committee</i> shall review and prepare periodic reports for submission to the <i>PEM Board</i> , the <i>DOE</i> and the <i>ERC</i> , as the case may be.             | Renumbering                                                                                                                                                                                                             |          |                                    |                               |              |



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| Title                                                                                               | Section | Provision                                                                                                                                                                                                                                                                                                                                                        | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                        | Rationale                                                                                                                                                                                                                                                | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| 4.1 – Market Assessment                                                                             |         |                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                          |          |                                    |                               |              |
| Section 4 – Market Monitoring<br><br>4.1 – Market Assessment                                        | 4.1.4   | 4.1.4 Upon submission to the <i>PEM Board</i> , the above-mentioned <i>Market Assessment Reports</i> shall be published in the <i>WESM market information website</i> .                                                                                                                                                                                          | 4.1.4 <del>4.1.5</del> Upon submission to the <i>PEM Board</i> , the above-mentioned <i>Market Assessment Reports</i> shall be published in the <i>WESM market information website</i> .                                                                                                                                                                                                                                                                  | Renumbering                                                                                                                                                                                                                                              |          |                                    |                               |              |
| Section 4 – Market Monitoring<br><br>4.3 – Periodic Monitoring by the Market Surveillance Committee | 4.3.1   | The <i>Market Surveillance Committee</i> shall meet at least once every month to carry out a review of the Market Assessment Report and the Retail Market Assessment Report submitted by the <i>Market Assessment Group</i> , and the preparation of the Monthly Monitoring Report and Retail Market Monitoring Report to be submitted to the <i>PEM Board</i> . | The <i>Market Surveillance Committee</i> shall meet at least once every month to <del>carry out</del> a review of the <b>WESM and Retail Market conditions</b> <del>Market Assessment Report and the Retail Market Assessment Report</del> <b>as</b> submitted <b>and presented</b> by the <i>Market Assessment Group</i> , and <del>to the</del> <b>prepare</b> <del>preparation of</del> <b>and submit</b> the Monthly Monitoring Report <del>and</del> | To clarify that the Market Surveillance Committee shall still meet at least once every month to review the current market conditions for both the WESM and Retail Market. This is to ensure the Committee’s immediate response for any issues or notable |          |                                    |                               |              |



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| Title                                        | Section | Provision                                                                                                                      | Proposed Amendment                                                                                                                        | Rationale                                                                                                                                                                                                                                                                                                                          | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         |                                                                                                                                | <del>Retail Market Monitoring Report</del> to be submitted to the <del>PEM Board</del> , <b><u>DOE and ERC</u></b> .                      | observations that require immediate action.<br><br>Further, the Monthly Monitoring Report, which contains the accomplishments of the Committee for every billing period, will still be prepared and submitted monthly to apprise the PEM Board, DOE and ERC of the activities undertaken of the Committee. For checks and balance. |          |                                    |                               |              |
| Section 4 – Market Monitoring                | 4.3.2   | Subject to existing health protocols issued by the National Government and/or local government units by reason of the COVID-19 | Subject to existing health protocols issued by the National Government and/or local government units by reason of <del>the COVID-19</del> | Make it general just in case there will be another form of pandemic happened in the future.                                                                                                                                                                                                                                        |          |                                    |                               |              |



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| Title                                                                                               | Section | Provision                                                                                                                                                                                                                                                                                                                                                           | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                  | Rationale                      | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| 4.3 – Periodic Monitoring by the Market Surveillance Committee                                      |         | pandemic, meetings of the <i>Market Surveillance Committee</i> shall be held “onsite” at the PEMC office premises or “online” via remote communication. The <i>PEMC</i> shall ensure that adequate space and facilities are allocated to the <i>Market Surveillance Committee</i> for this purpose.                                                                 | pandemic, meetings of the <i>Market Surveillance Committee</i> shall be held “onsite” at the PEMC office premises or “online” via remote communication. The <i>PEMC</i> shall ensure that adequate space and facilities are allocated to the <i>Market Surveillance Committee</i> for this purpose.                                                                 |                                |          |                                    |                               |              |
| Section 4 – Market Monitoring<br><br>4.3 – Periodic Monitoring by the Market Surveillance Committee | 4.3.4   | In the periodic monitoring meetings, the <i>Market Surveillance Committee</i> shall:<br><br>(a) Assess market monitoring indices and price trends in the <i>WESM</i> and the Retail Market to evaluate whether spot prices and reserve prices are in line with those that may be expected in an effectively competitive market; Identify market outcomes or pricing | In the periodic monitoring meetings, the <i>Market Surveillance Committee</i> shall:<br><br>(a) Assess market monitoring indices and price trends in the <i>WESM</i> and the Retail Market to evaluate whether spot prices and reserve prices are in line with those that may be expected in an effectively competitive market; Identify market outcomes or pricing | remove the redundant provision |          |                                    |                               |              |



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| WESM Manual on Market Surveillance Issue 2.0                                                        |         |                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                        |                                                                                                                                                                        |          |                                    |                               |              |
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| Title                                                                                               | Section | Provision                                                                                                                                                                                                                                 | Proposed Amendment                                                                                                                                                                                                                                                                     | Rationale                                                                                                                                                              | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                                                                                     |         | situations that are inefficient or contrary to competition or the <i>WESM</i> objectives;<br>(b) Identify market outcomes or pricing situations that are inefficient or contrary to competition or the <i>WESM</i> Objectives;<br><br>xxx | <del>situations that are inefficient or contrary to competition or the <i>WESM</i> objectives;</del><br>(b) Identify market outcomes or pricing situations that are inefficient or contrary to competition or the <i>WESM</i> Objectives;<br><br>xxx                                   |                                                                                                                                                                        |          |                                    |                               |              |
| Section 4 – Market Monitoring<br><br>4.3 – Periodic Monitoring by the Market Surveillance Committee | 4.3.7   | The <i>Market Surveillance Committee</i> shall prepare a Monthly Monitoring Report at the end of each periodic monitoring meeting which shall contain:<br><br>xxx<br><br>(g) Approved Market Assessment Report                            | The <i>Market Surveillance Committee</i> shall prepare a <del>Monthly</del> <b>Quarterly</b> Monitoring Report at the end of <del>each</del> periodic monitoring <b>period</b> <del>meeting</del> which shall contain:<br><br>xxx<br><br>(g) Approved Market <u>Assessment Reports</u> | It is being proposed to shift from monthly to quarterly monitoring to avoid redundancy in the reports as well as enhance the depth and accuracy of market assessments. |          |                                    |                               |              |



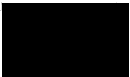
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| WESM Manual on Market Surveillance Issue 2.0                                                        |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                               |          |                                    |                               |              |
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| Title                                                                                               | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Rationale                                                                                                     | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| Section 4 – Market Monitoring<br><br>4.3 – Periodic Monitoring by the Market Surveillance Committee | 4.3.8   | The <i>Market Surveillance Committee</i> shall submit to the <i>PEM Board</i> the following:<br><br>(a) Monthly Monitoring Report, not later than one week after its approval;<br>(b) Quarterly Retail Market Monitoring Report, not later than one week after its approval;<br>(c) Annual Retail Market Monitoring Report, within the first quarter of the succeeding year;<br>(d) Annual Market Assessment Report, within the third quarter of the succeeding year; and<br>(e) Annual Report, which contains its accomplishments and work plan, within the first quarter of the succeeding year. | The <i>Market Surveillance Committee</i> shall submit to the <i>PEM Board</i> the following:<br><br>(a) <del>Monthly</del> and <b><u>Quarterly</u></b> Monitoring Report, not later than one week after its approval;<br><b><u>(c) Annual Monitoring Report, which contains its accomplishments and work plan, within the first quarter of the succeeding year;</u></b><br><del>(d) (b)</del> Quarterly Retail Market <b><u>Assessment</u></b> Monitoring Report, not later than one week after its approval;<br>(c) Annual Retail Market <b><u>Assessment</u></b> Monitoring Report, within the first quarter of the succeeding year;<br><b><u>(d) Quarterly Market Assessment Report, not</u></b> | To reflect the existing timescale of the reports submitted and prepared by the Committee.<br><br>Renumbering. |          |                                    |                               |              |



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| Title                                        | Section | Provision                                                                                                                                   | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Rationale                                                                                 | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         |                                                                                                                                             | <p><u>later than one week after its approval;</u><br/><del>(e) (d)</del> Annual Market Assessment Report, within the <u>second</u> <del>third</del> quarter of the succeeding year; and<br/><u>(f) Quarterly Over-riding Constraints Report, not later than one week after its approval;</u><br/><u>(g) Annual Over-riding Constraints Report, within the third quarter of the succeeding year; and</u><br/><del>(e) Annual Report, which contains its accomplishments and work plan, within the first quarter of the succeeding year.</del></p> |                                                                                           |          |                                    |                               |              |
| Section 4 – Market Monitoring                | 4.3.9   | The <i>Market Surveillance Committee</i> shall transmit a copy of the Monthly Monitoring Report, Annual Market Assessment Report, Quarterly | The <i>Market Surveillance Committee</i> shall transmit a copy of the <del>Monthly</del> <u>Quarterly</u> Monitoring Report, <u>Quarterly</u> <del>and</del> Annual Market                                                                                                                                                                                                                                                                                                                                                                       | To reflect the existing timescale of the reports submitted and prepared by the Committee. |          |                                    |                               |              |



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| Title                                                          | Section | Provision                                                                                                     | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                       | Rationale                                                                                                                                                                                              | Comments                                                                                                                                                                                                                                       | Proposed Wording based on Comments | Original Proponent’s Response                                                                                                      | RCC Decision |
| 4.3 – Periodic Monitoring by the Market Surveillance Committee |         | Retail Market Monitoring Report and Annual Retail Market Monitoring Report to the <i>DOE</i> and <i>ERC</i> . | Assessment Report, Quarterly <b><u>and Annual</u></b> Retail Market <b><u>Assessment</u></b> Monitoring Report and Annual Retail Market Monitoring Report <b><u>Quarterly and Annual Over-riding Constraints Report</u></b> to the <i>DOE</i> and <i>ERC</i> .                                                                                                                                                           | Harmonization of the term / name of the reports for clarity.                                                                                                                                           |                                                                                                                                                                                                                                                |                                    |                                                                                                                                    |              |
| Section 5 – Other Review Functions                             |         | <b>(NEW)</b>                                                                                                  | <b><u>5.6 Review of the Proposed Amendments to the WESM Penalty Manual</u></b><br><br><b><u>5.6.1 The proposals shall be submitted to the Market Surveillance Committee, through the WESM Governance Committee Secretariat, who shall check for the completeness of the proposal and its compliance with the formal requirements set forth in Section 7.1.4 of the WESM Penalty Manual. Only proposals which are</u></b> | 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. | <b><u>MEI/PEI</u></b><br><br><b><u>We suggest that proposals for amendments to the WESM Penalty Manual as well as comments to these proposed amendments by stakeholders be submitted through a “Submit Proposals and Comments” section</u></b> |                                    | <i>For MEI/PEI:</i><br><br><i>This is duly noted. The MSC will consider including a page in the PEMC website for this purpose.</i> |              |



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| Title                                        | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Rationale | Comments                                                                                                                                                                                                                                                                 | Proposed Wording based on Comments | Original Proponent’s Response                                | RCC Decision |
|                                              |         |           | <p><u><i>made in the prescribed form shall be accepted and considered as submitted.</i></u></p> <p><u><i>5.6.2 Complete proposals shall be given due course and shall be forwarded to the Market Surveillance Committee for consideration within five (5) working days from receipt of complete proposal.</i></u></p> <p><u><i>5.6.3 Incomplete proposals or those which do not comply with the formal requirements shall be denied due course, and the WESM Governance Committee Secretariat shall notify the proponent of the denial citing the grounds therefor. The proponent may resubmit the proposal and</i></u></p> |           | <p><i>of the MSC webpage, similar to that of the RCC</i></p> <p><b>NGCP:</b></p> <p>Task is more appropriate for the RCC rather than the MSC.</p> <p>Further, it is necessary that the proposal be reviewed and approved by PEM Board before seeking DOE’s approval.</p> |                                    | <p><i>For NGCP: See response in the general comment.</i></p> |              |



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| Title                                        | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Rationale | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         |           | <p><u><i>comply with the formal requirements.</i></u></p> <p><u><i>5.6.4 Upon endorsement by the WESM Governance Committee Secretariat,</i></u></p> <p><u><i>(a) the Market Surveillance Committee shall give due course to the proposal in the next Committee meeting.</i></u></p> <p><u><i>b) if the Market Surveillance Committee finds that the proposal does not satisfy the criteria as prescribed in Sections 7.1.2 of the WESM Penalty Manual, it shall notify the proponent within ten (10) working days of its decision and the reasons therefor.</i></u></p> |           |          |                                    |                               |              |



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| Title                                        | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Rationale | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         |           | <p><u><i>c) if the Market Surveillance Committee determines that the proposal satisfies the criteria as prescribed in Section 7.1.2 and 7.1.3 of the WESM Penalty Manual, it shall notify the proponent of the proposal and proceed to evaluate the proposal in the manner set forth in this Market Manual.</i></u></p> <p><u><i>5.6.5 Consultation to Other Committees and Entities</i></u></p> <p><u><i>a) The Market Surveillance Committee shall notify all the WESM participants, as well as other interested parties of the proposal through publication, inviting them to give written submissions regarding the proposal.</i></u></p> |           |          |                                    |                               |              |



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| Title                                        | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Rationale | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         |           | <p><u><i>b) The Market Surveillance Committee shall hold a consultation meeting with the Rules Change Committee and the PEM Board on the proposed amendments within thirty (30) working days from the date of first publication of notice.</i></u></p> <p><u><i>5.6.6 Adoption and Approval of the Proposal</i></u></p> <p><u><i>a) If the Market Surveillance Committee concludes that the proposal satisfies the prescribed criteria and that the procedures set forth in this Manual and in the WESM Penalty Manual have been duly complied with, it</i></u></p> |           |          |                                    |                               |              |



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Annex C – Matrix on the Consolidated Comments to the Proposed General Amendments to the WESM Rules and Various WESM Manuals on the Market Surveillance Committee Processes

| WESM Manual on Market Surveillance Issue 2.0 |         |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |           |          |                                    |                               |              |
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| Title                                        | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Rationale | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         |           | <p><u><i>shall approve the amendment.</i></u></p> <p><u><i>b) In any case, the Market Surveillance Committee may approve the proposal with modifications if it deems proper.</i></u></p> <p><u><i>5.6.7 If the Market Surveillance Committee concludes that the proposal does not satisfy the prescribed criteria, it shall notify the proponent, the parties who made written submissions, of its decision and the reasons for rejection, within five (5) working days from the approval of the resolution on the deliberation of the proposal.</i></u></p> |           |          |                                    |                               |              |



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| WESM Manual on Market Surveillance Issue 2.0 |         |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |           |          |                                    |                               |              |
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| Title                                        | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Rationale | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                              |         |           | <p><u><b>5.6.8 If the Market Surveillance Committee determines that the procedures set forth in this Manual were not duly complied with and that the breach of procedure is material, it shall refer the proposal back to the Proponent so that the procedural error can be rectified.</b></u></p> <p><u><b>5.6.9 Pursuant to Clause 7.2.5.5 of the WESM Rules and Sections 3 and 7 of the WESM Penalty Manual, the Market Surveillance Committee shall endorse the approved proposal(s) to the DOE for its review and promulgation, thereafter.</b></u></p> |           |          |                                    |                               |              |



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| WESM Manual on Market Surveillance Issue 2.0          |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                     |          |                                    |                               |              |
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| Title                                                 | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Rationale                                                                                                           | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| Section 7 – Access to Information and Data Management | 7.4     | A request for information by the <i>Market Surveillance Committee, Enforcement and Compliance Office</i> and <i>Market Assessment Group</i> shall:<br><br>(a) Be in writing;<br><br>(b) Indicate the reason for the request;<br><br>(c) Specify the document or information requested and, when applicable, the format;<br><br>(d) Specify a reasonable time within which the information must be provided; and<br>Provide other relevant information or clarification to ensure that the request is understood by the Recipient. | A request for information by the <i>Market Surveillance Committee, <del>Enforcement and Compliance Office</del></i> and <i>Market Assessment Group</i> shall:<br><br>(a) Be in writing;<br><br>(b) Indicate the reason for the request;<br><br>(c) Specify the document or information requested and, when applicable, the format;<br><br>(d) Specify a reasonable time within which the information must be provided; and<br><br><u>(e)</u> Provide other relevant information or clarification to ensure that the request is understood by the Recipient. | Removal of ECO since the enforcement and compliance functions were transferred to CC.<br><br>Minor / clerical edit. |          |                                    |                               |              |



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| WESM Manual on Market Surveillance Issue 2.0            |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                       |          |                                    |                               |              |
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| Title                                                   | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                         | Rationale                                                                             | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| Section 8 – Confidentiality                             | 8.8     | The members of the <i>Market Surveillance Committee, Enforcement and Compliance Office and Market Assessment Group</i> as the case may be, shall prepare a version of their Reports, deleting information they have determined to be confidential, to enable its dissemination and publication.                                                                                                                                                            | The members of the <i>Market Surveillance Committee, Enforcement and Compliance Office and Market Assessment Group</i> as the case may be, shall prepare a version of their Reports, deleting information they have determined to be confidential, to enable its dissemination and publication.                                                                                                                                                            | Removal of ECO since the enforcement and compliance functions were transferred to CC. |          |                                    |                               |              |
| Section 9 – Limitation of Liability and Indemnification | 9.1     | Members of the <i>PEM Board</i> and other <i>PEMC</i> officers and staff, <i>Market Surveillance Committee, Enforcement and Compliance Office</i> , and the <i>Market Assessment Group</i> , as the case may be, shall not be made personally liable for any loss, liability or damage suffered or incurred by a <i>WESM member</i> , the <i>System Operator</i> , the <i>Market Operator</i> or any other person by reason of a disclosure of information | Members of the <i>PEM Board</i> and other <i>PEMC</i> officers and staff, <i>Market Surveillance Committee, Enforcement and Compliance Office</i> , and the <i>Market Assessment Group</i> , as the case may be, shall not be made personally liable for any loss, liability or damage suffered or incurred by a <i>WESM member</i> , the <i>System Operator</i> , the <i>Market Operator</i> or any other person by reason of a disclosure of information | Removal of ECO since the enforcement and compliance functions were transferred to CC. |          |                                    |                               |              |



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| WESM Manual on Market Surveillance Issue 2.0            |         |                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                       |          |                                    |                               |              |
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| Title                                                   | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                 | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                   | Rationale                                                                             | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                                         |         | in reports prepared as a result of the exercise of assessment, monitoring and compliance functions undertaken in accordance with the <i>WESM Rules, Retail Rules</i> or this <i>Market Manual</i> , unless they have acted with malice, manifest partiality, evident bad faith, gross incompetence or gross negligence.                                                                                   | in reports prepared as a result of the exercise of assessment, monitoring and compliance functions undertaken in accordance with the <i>WESM Rules, Retail Rules</i> or this <i>Market Manual</i> , unless they have acted with malice, manifest partiality, evident bad faith, gross incompetence or gross negligence.                                                                                              |                                                                                       |          |                                    |                               |              |
| Section 9 – Limitation of Liability and Indemnification | 9.2     | Should any member of the <i>PEM Board</i> and other <i>PEMC</i> officers and staff, <i>Market Surveillance Committee, Enforcement and Compliance Office, Market Assessment Group</i> , as the case may be, be adjudged liable for any amount for liability or damage suffered or incurred by any person or entity, the <i>PEMC</i> shall hold them free and harmless from such loss, liability or damage, | Should any member of the <i>PEM Board</i> and other <i>PEMC</i> officers and staff, <i>Market Surveillance Committee, <del>Enforcement and Compliance Office</del>, Market Assessment Group</i> , as the case may be, be adjudged liable for any amount for liability or damage suffered or incurred by any person or entity, the <i>PEMC</i> shall hold them free and harmless from such loss, liability or damage, | Removal of ECO since the enforcement and compliance functions were transferred to CC. |          |                                    |                               |              |



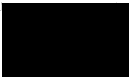
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| WESM Manual on Market Surveillance Issue 2.0                                   |         |                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                  |          |                                    |                               |              |
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| Title                                                                          | Section | Provision                                                                                                                                                                                                                                                                                                                                                         | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                | Rationale                                                                                        | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
|                                                                                |         | and shall fully indemnify said persons through an indemnification process to be developed by the <i>PEM Board</i> ; Provided, however, that the indemnification shall exclude any liability arising out of conduct involving malice, manifest partiality, evident bad faith, gross incompetence or gross negligence. Said indemnification shall cover:<br><br>xxx | and shall fully indemnify said persons through an indemnification process to be developed by the <i>PEM Board</i> ; Provided, however, that the indemnification shall exclude any liability arising out of conduct involving malice, manifest partiality, evident bad faith, gross incompetence or gross negligence. Said indemnification shall cover:<br><br>xxx |                                                                                                  |          |                                    |                               |              |
| Section 10 – Amendment , Publication and Effectivity<br><br>10.2 – Publication | 10.2.1  | This Manual, as it may be amended from time to time, shall be published in the market information website maintained by the <i>Market Operator</i> .<br><br>This Manual or any amendments thereto shall                                                                                                                                                           | This Manual, as it may be amended from time to time, shall be published in the market information website maintained by the <del>Market Operator</del> <b><u>WESM Governance Arm</u></b> .                                                                                                                                                                        | To reflect the appropriate entity with oversight in the amendment and publication of the Manual. |          |                                    |                               |              |



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| WESM Manual on Market Surveillance Issue 2.0 |         |                                                                                                                                                           |                                                                                                                                                                                                       |           |          |                                    |                               |              |
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| Title                                        | Section | Provision                                                                                                                                                 | Proposed Amendment                                                                                                                                                                                    | Rationale | Comments | Proposed Wording based on Comments | Original Proponent’s Response | RCC Decision |
| and Effectivity                              |         | become effective upon approval of the <i>DOE</i> in accordance with WESM Rules Clause 8.6.4. The date of effectivity shall be indicated in this document. | This Manual or any amendments thereto shall become effective upon approval of the <i>DOE</i> in accordance with WESM Rules Clause 8.6.4. The date of effectivity shall be indicated in this document. |           |          |                                    |                               |              |



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Annex D – Matrix on the Proposed General Amendments to the WESM Penalty Manual on Penalty-related Rules Change Processes



| WESM PENALTY MANUAL ISSUE 3.0 |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                  |          |                                    |                               |              |
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| Title                         | Section | Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Rationale                        | Comments | Proposed Wording based on Comments | Original Proponent’s Response | MSC Decision |
| Legal Framework               | 1.1.3   | <p>Pursuant to this legal mandate, WESM Rules Clause 1.6.3 (Chapter 1)1, provides that the <i>Market Surveillance Committee</i> shall design the <i>penalty</i> levels and appropriate range of <i>penalties</i> that will be applied for <i>breaches</i> of the WESM Rules. This is to be done in consultation with the Rules Change Committee and the PEM Board. The <i>penalty</i> levels and ranges are to be reviewed by the <i>Market Surveillance Committee</i> from time to time and as may be necessary.</p> <p>Footnote --<br/>1 WESM Rules clauses 1.6.3 is being amended and transferred to WESM Rules Section 7.2.</p> | <p>Pursuant to this legal mandate, WESM Rules Clause <del>1.6.3</del><u>7.2</u> (<del>Chapter 1</del>)1, provides that the <i>Market Surveillance Committee</i> shall design the <i>penalty</i> levels and appropriate range of <i>penalties</i> that will be applied for <i>breaches</i> of the WESM Rules. This is to be done in consultation with the Rules Change Committee and the PEM Board. The <i>penalty</i> levels and ranges are to be reviewed by the <i>Market Surveillance Committee</i> from time to time and as may be necessary.</p> <p><del>Footnote --<br/>1 WESM Rules clauses 1.6.3 is being amended and transferred to WESM Rules Section 7.2.</del></p> | To reflect the current provision |          |                                    |                               |              |



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| Title                         | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Rationale                                                                                                                 | Comments | Proposed Wording based on Comments | Original Proponent’s Response | MSC Decision |
|                               |         | (new)     | <p><b><u>7.1.4 The proposal shall:</u></b></p> <p><b><u>a) be in writing addressed to the <i>Market Surveillance Committee</i> through the <i>WESM Governance Committee Secretariat</i>, using the prescribed penalty provision rules change proposal form;</u></b></p> <p><b><u>b) include a discussion:</u></b></p> <p><b><u>i) demonstrating that the proposed amendment satisfies the criteria set forth in Section 7.1.2 of this Manual;</u></b></p> <p><b><u>ii) giving the reasons that the proposed amendment is desirable or necessary;</u></b></p> | To serve as guidance for the MSC and to any interested parties in the process of rules changes to the WESM Penalty Manual |          |                                    |                               |              |



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| Title                         | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                      | Rationale                                                                                                                 | Comments | Proposed Wording based on Comments | Original Proponent’s Response | MSC Decision |
|                               |         |           | <p><u>iii) containing sufficient information to permit proper consideration by the Market Surveillance Committee of the reasons cited, including the public benefit, if any, of making the amendment; and</u></p> <p><u>iv) demonstrating that the proposed amendment falls within the definition of an urgent amendment, in appropriate cases.</u></p> |                                                                                                                           |          |                                    |                               |              |
|                               |         | (new)     | <p><b><u>7.1.5 Written Submissions</u></b></p> <p><b><u>a) The written submissions requested shall be given within thirty (30) working days from the date of publication of the notice, in coordination with the Rules</u></b></p>                                                                                                                      | To serve as guidance for the MSC and to any interested parties on the process of rules changes to the WESM Penalty Manual |          |                                    |                               |              |



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| Title                         | Section | Provision | Proposed Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Rationale | Comments | Proposed Wording based on Comments | Original Proponent’s Response | MSC Decision |
|                               |         |           | <p><u><b>Change Committee in case the amendments will affect the WESM Rules and other Market Manuals. The proponent shall be invited to respond during deliberation of the comments submitted.</b></u></p> <p><u><b>b) Only written submissions received by the WESM Governance Committee Secretariat within the prescribed period shall be validly considered by the Market Surveillance Committee.</b></u></p> <p><u><b>c) All written submissions shall contain the name and address of the person making the submission and shall be made using the Rules Change for Penalty Provision Submission form.</b></u></p> |           |          |                                    |                               |              |



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| WESM PENALTY MANUAL ISSUE 3.0 |         |                                                                                         |                                                                                                                                                                                                                                                                                                                                                              |              |          |                                    |                               |              |
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| Title                         | Section | Provision                                                                               | Proposed Amendment                                                                                                                                                                                                                                                                                                                                           | Rationale    | Comments | Proposed Wording based on Comments | Original Proponent’s Response | MSC Decision |
|                               |         |                                                                                         | <p><u><b>Documents and other materials supporting the comments made may also be attached to the written submission.</b></u></p> <p><u><b>d) The written submissions may be provided through printed document, by electronic means or by facsimile, and directed to the Rules Change Committee through the WESM Governance Committee Secretariat.</b></u></p> |              |          |                                    |                               |              |
|                               | 7.1.4   | Amendments to this Manual shall be approved and promulgated by the Department of Energy | 7.1.4 <del>6</del> Amendments to this Manual shall be approved and promulgated by the Department of Energy                                                                                                                                                                                                                                                   | Renumbering. |          |                                    |                               |              |



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Annex E – Draft RCC Resolution on the Request for Extension of the Effectivity of Urgent Amendments to the WESM Manual on Dispatch Protocol on Issuance and Coverage of Dispatch Schedule below Minimum Stable Load (Pmin)

Resolution No. 2025-03

RULES CHANGE COMMITTEE

Request for Extension of Effectivity of Urgent Amendments to the WESM Manual on Dispatch Protocol on Issuance and Coverage of Dispatch Schedule below Minimum Stable Load (~~Pmin~~)



Effective Date : 19 September 2025  
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WHEREAS, the PEM Board approved on 23 October 2024 RCC Resolution No. 2024-07 entitled “Proposed Urgent Amendments on WESM Manual on Dispatch Protocol (DPM) on Issuance and Coverage of Dispatch Schedules below Minimum Stable Load”, which sought to amend the DPM to:

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

WHEREAS, in accordance with the rules change process for urgent amendments<sup>2</sup>, the revised market document was posted in the Governance Arm Website on 24 October 2024, with changes that are effective until six (6) months from the date of posting (i.e. from 25 October 2024 until 25 April 2025) or until the corresponding general amendment of the same matter is promulgated by the DOE, whichever is earlier;

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

WHEREAS, the RCC proceeded to deliberate on and finalize the general proposed amendments over two (2) meetings<sup>1</sup>, approved the endorsement of the same to the PEM Board, as revised, per RCC Resolution No. 2025-01 dated 13 March 2025; and in the same Resolution likewise recommended extending the effectivity of the urgent amendments for another six (6) months (until 25 October 2025), as permitted in the Section 7.4 (g) of the Rules Change Manual;

WHEREAS, the PEM Board approved the general amendments and the recommendation to extend the effectivity of the urgent amendments on 28 March 2025 per PEM Board Resolution No. 2025-82-03, which was thereafter endorsed to the DOE for final approval on 24 April 2025;

WHEREAS, the DOE is conducting public consultations on the draft Department Circular regarding the proposal with the Luzon leg held on 02 September (Muntinlupa City), and Visayas and Mindanao legs scheduled on 24 September (Cebu City) and 07 October 2025 (Cagayan de Oro City), respectively, to allow WESM members and stakeholders to provide comments;

<sup>1</sup> 17 January and 21 February 2025



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Annex E – Draft RCC Resolution on the Request for Extension of the Effectivity of Urgent Amendments to the WESM Manual on Dispatch Protocol on Issuance and Coverage of Dispatch Schedule below Minimum Stable Load (Pmin)

RCC-RE 30-25-08  
*Request for Extension of Effectivity of Urgent Amendments to the  
WESM Manual on Dispatch Protocol on Issuance and Coverage of  
Dispatch Schedule below Minimum Stable Load (Pmin)*

**WHEREAS**, noting that the effectivity of the PEM-Board approved urgent amendments is due to expire by 25 October 2025 and in view of the ongoing consultation of the DOE, the RCC again recommends extending the effectivity of the urgent amendments for another six (6) months or until the DOE approved the corresponding general amendments;

**NOW THEREFORE**, we, the undersigned, on behalf of the sectors we represent, hereby resolve that extending the implementation of the PEM-Board approved Urgent Amendments is necessary considering the material effects to the scheduling of renewable energy resources should said amendments cease to take effect;

**RESOLVED**, that the RCC recommends to the PEM Board extending the effectivity of the PEM-Board Approved Urgent Amendments for another six (6) months or until the DOE approved the corresponding general amendments;

Done this 19<sup>th</sup> day of September 2025, Pasig City.