



ORCP-WM-26-03

Call for Comments to the Proposed General Amendments on Additional Conditions for Qualifying a Frequency Driven Event (FDE)

The Rules Change Committee (RCC) is inviting all WESM Members and interested parties to submit comments to SNAP Group's Proposed General Amendments to the WESM Ancillary Services Monitoring Manual (ASMM) Issue 1.2 on Additional Conditions for Qualifying a Frequency Driven Event (FDE) (*ORCP-WM-26-03*).

The proposed amendment seeks to amend Section 5.6.2 of the ASMM by introducing an additional condition to determine the termination of an FDE, in view of the following:

- a. Give ample time for the Reserve Facility to normalize its loading near the Unit setpoint, which is the initial reference of the Unit governor in computing the desired response.
- b. Variances from the Reserve Facility's Frequency Reference compared to the System Frequency.
- c. Reduction of multiple Frequency Driven Events occurrences.

BACKGROUND:

The SN Aboitiz Power-Magat, Inc. and SN Aboitiz Power-Benguet, Inc. (collectively, the 'SNAP Group') submitted the proposed amendments on 24 March 2026 as an Urgent Amendment. Upon deliberation during its 257th Regular Meeting, the RCC determined that the proposal did not meet the urgency criteria and subsequently reclassified it as a General Amendment proposal. Consequently, the PEM Board, during its 95th Meeting on 29 April 2026, concurred with the RCC's decision on the said proposal.

DOCUMENTS:

Provided below are relevant materials for your reference and perusal:

- [Original Rules Change Proposal submitted by SNAP Group \(ORCP-WM-26-02\)](#)
- [Presentation of the Proposed Amendment](#)
- [PEM Board-approved proposal \(RCC Resolution No. 2026-03\) per PEM Board Approval on 29 April 2026](#)



- RCC Form 3: Matrix of Proposed Amendments for Comments – Annexes of this document *(Please write your comments in the proper columns in the matrix.)*

Kindly submit your comments (in Word format) through the '[File a Submission](#)' webpage no later than **16 June 2026** or 30 working days from the date of publication (04 May 2026). We recommend using Firefox browser for submitting your comments.

Please ensure that your submission is signed securely by the designated approving authority and/or representative of your company, and input in the proper field the e-mail address of your point person(s) whom we could contact regarding activities related to the processing of the proposal.

All comments received shall be published in the PEMC website.

Thank you!

Rules Review Division

Market Assessment Group

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TO BE ACCOMPLISHED BY THE PARTY SUBMITTING THE COMMENTS

[In accomplishing and submitting this form, you give your consent for PEMC to collect, record, organize, and update your personal data as herein provided as part of your information for purposes of rules change process.]

Commenter's Information

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Proposed General Amendments to WESM Ancillary Services
Monitoring Manual Issue 1.2 on Additional Conditions for Qualifying a
Frequency Driven Event (FDE)

Comments to the Proposed General Amendments to WESM Ancillary Services Monitoring Manual Issue 1.2 on Additional Conditions for Qualifying a Frequency Driven Event (FDE)

Commenter	General Comments	Proponent’s Response
<u>GNPK</u>	This comment is intended for the ECO and/or relevant groups of PEMC: GNPK respectfully requests to provide the event categories for Reserve Conformance Standards and Reserve Offered Capacity Compliance. This will serve as guidance for Ancillary Service Providers in accomplishing non-compliance notices and in identifying the applicable supporting documents required for each event category.	

WESM ANCILLARY SERVICES MONITORING MANUAL 1.2						
Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments
Section 5.6 Measuring Reserve Response Compliance of Generators on	5.6.2.	A <i>reserve facility’s</i> response accuracy via GCM shall be calculated as follows.¹² xxx The event will qualify as <i>Frequency-Driven Event</i>, for this purpose, if: a. the event lasts for more than five (5) seconds; and b. the frequency deviation exceeds the deadband setting by 0.02 Hz for conventional generating units and 0.01 Hz for battery energy storage systems. xxx	A <i>reserve facility’s</i> response accuracy via GCM shall be calculated as follows.¹² xxx The event will qualify as <i>Frequency-Driven Event</i>, for this purpose, if: a. the event lasts for more than five (5) seconds; and b. the frequency deviation exceeds the deadband setting by 0.02 Hz for conventional generating units and 0.01 Hz for battery energy storage systems-; <u>c. the frequency deviation normalizes below the deadband setting by 0.02 Hz for conventional generating units</u>	To provide the Reserve Facilities an additional tolerance with the following considerations: a. Give ample time for the Reserve Facility to normalize its loading near the Unit setpoint, which is the initial reference of the Unit governor in computing the desired response. b. Variances from the Reserve Facility’s Frequency Reference compared to the System Frequency	GNPK would like to respectfully suggest that instead of introducing these as additional qualifying conditions for an FDE, it is suggested that they be positioned as conditions for determining the start and end of an FDE. We would also like to propose an amendment to Section 5.6.2 – Response Accuracy Formula	5.6.2 – Response Accuracy Proposed Formula: Response Accuracy (%) = (Real-Time Actual Gross MW Response / Real-Time Expected MW Response) × 100 Where: Real-Time Actual Gross MW Response = Actual Gross MW – Capped Gross Load Demand Capped Gross Load Demand is defined as the sum of the Net Energy Schedule and House Load, taking

WESM ANCILLARY SERVICES MONITORING MANUAL 1.2

Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments
			<u>and 0.01 Hz for battery energy storage; and</u> <u>d. the frequency deviation normalizes below the threshold for at least 25 seconds.</u> <u>For clarity, item (a) and item (b) determine the start of a FDE, while item (c) and item (d) determine the end of a FDE.</u> xxx	c. Reduction of multiple Frequency Driven Events occurrences The additional provisions aim to combine the evaluation of multiple FDEs, and not exclude any FDE. This ensures that the system frequency has sufficiently recovered before registering a new event. It prevents premature triggering of multiple FDEs caused by short-lived or oscillatory frequency dips around the threshold.		into account the Unit's ramping limitations during and after load changes resulting from the Net Energy Schedule, MOT requests, or Secondary Response. • Real Time Expected MW Response = {(Nominal Frequency – Deadband Setting) – Actual Frequency During Frequency-Driven Event} * Static Gain • Notes: 1. The Capped Gross Load Demand represents the Unit's actual gross MW target or reference point during and after normal load

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						changes, excluding any contribution from Primary Frequency Response contribution. 2. The Unit's control system calculates the expected Primary Response Output using the Capped Gross Load Demand as the reference point and applies an additional output adjustment corresponding to the expected response determined by the control system. xxx An FDE shall cease when the frequency deviation normalizes in accordance with the deadband setting for the relevant reserve type and remains

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						within such deadband setting for at least twenty-five (25) seconds. c. the frequency deviation normalizes below the deadband setting by 0.02 Hz for conventional generating units and 0.01 Hz for battery energy storage; and d. the frequency deviation normalizes below the threshold for at least 25 seconds. For clarity, item (a) and item (b) determine the start of a FDE, while item (c) and item (d) determine the end of a FDE.