



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 256th 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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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
PEMC	PEMC supports the proposal to have clear conditions to define the end of a Frequency Driven Event (FDE). However, the proposed amendment may require insights from System Operator (SO) insights on the following: • The impact of overall operation and monitoring and whether the current 80% Average Response Accuracy per relevant settlement interval needs to be updated as the proposed amendment suggests in increase in accuracy due to longer evaluation period rather than an actual change in plant performance. • The difference in data measurements between generating companies (GenCo) and the Enforcement and Compliance Office (ECO). The Proponent raised that while GenCo respond based on plant-level frequency, ECO's performance monitoring uses system frequency, which is measured up to three decimal places. • Whether the 25-second normalization period is applicable to all reserve types and technologies. • Whether the SO will adopt this rule into its contracted ASPs once the proposal is approved. • Any risks to system security if this proposal will be implemented For reference, we refer to the simulation presented by PEMC-ECO during the RCC meeting held on 10 April 2026. The results confirm that the proposal's objective—to prevent unnecessary flagging of possible breaches arising from sequential frequency disturbances—will be achieved through the consolidation of FDEs. From the compliance monitoring perspective, this approach is deemed to improve the clarity of compliance assessments. <i>(Please refer to Page 4 to 22, Minutes of 257th RCC Meeting)</i> Monitoring on the implementation of the revised rules, should they be approved, would be warranted to assess the impact to actual RR and CR response. What could be the possible metrics and criteria to state that this proposal, once implemented, is deemed effective?	

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.	<i>A 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	<i>A 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 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.</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 c. Reduction of multiple Frequency Driven Events occurrences The additional provisions aim to combine the evaluation of multiple	PEMC supports the proposal to have clear conditions to define the end of a Frequency-Driven Event. PEMC conducted a simulation applying the proposed condition for the August 2025 billing period. The results indicate that the proposed 25-second period to return to the nominal frequency must account for the rapid nature of frequency fluctuations, which can lead to overlapping events. This overlapping is most likely to occur in regulating reserves. Consequently, PEMC proposes an additional criterion to help prevent the occurrence of overlapping events.	<i>A 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 and 0.01 Hz for battery energy storage; and</u>

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			<u>while item (c) and item (d) determine the end of a FDE.</u> xxx	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.		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. <u>The Frequency-Driven Event shall be deemed to have terminated when:</u> a. <u>the frequency has normalized within the deadband setting by 0.02Hz for conventional generating units and 0.01 Hz for battery energy storage systems; and</u> b. <u>the frequency has normalized and stayed within such threshold for at least 25 seconds or has reached the nominal</u>

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						frequency, whichever comes first. xxx