



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 23 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](#)



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

- 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

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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
	Please write your general comment here, if any.	

WESM ANCILLARY SERVICES MONITORING MANUAL 1.2					
Title	Section	Provision	Proposed Amendment	Rationale	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 and 0.01 Hz for battery energy storage; and</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	We support the intent of the proposed amendment to introduce explicit end-conditions for an FDE, recognizing the operational issues caused by oscillatory frequency deviations around the deadband threshold that result in multiple FDE tagging within a single disturbance. However, we have also noted the following concerns with the proposed wording: a. Proposed item (c) contains a directional ambiguity. The phrase "<i>normalizes below the deadband setting by 0.02 Hz</i>" could be read as requiring the frequency to fall further below 59.84
					c. the <u>system</u> frequency <u>has recovered to at least deviation normalizes-below 0.02 Hz above</u> the deadband setting by-for conventional generating units <u>(i.e., recovered to at least 59.86 Hz)</u> and 0.01 Hz <u>above</u> for battery energy storage; and d. the <u>system</u> frequency has <u>sustained the recovery deviation normalizes-below</u> the threshold for at least 25 <u>continuous</u> seconds. <u>(i.e. the system frequency has recovered to</u>

WESM ANCILLARY SERVICES MONITORING MANUAL 1.2					
Title	Section	Provision	Proposed Amendment	Rationale	Comments
			<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	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.	Hz (i.e., toward 59.82 Hz), which is the opposite of the intended recovery direction. To accurately reflect the proposal's intent, item (c) should clearly state that the system frequency must recover to at least 0.02 Hz above the deadband setting (i.e., to at least 59.86 Hz for conventional generating units). b. Proposed item (d) does not explicitly anchor the 25-second sustain period to the satisfaction of item (c). As currently worded, it is unclear whether the 25-second clock begins only after the frequency has reached the recovery threshold in item (c). The wording should make the sequential relationship between the two conditions explicit and enforceable.
					at least 59.86Hz for 25 seconds)