



ORCP -WM-26-04

**Call for Comments to the Proposed General Amendments to the WESM Manual on
Metering Standards and Procedures regarding Metering Installation Requirements
(ORCP- WM-26-04)**

The Rules Change Committee (RCC) is inviting all WESM Members and interested parties to submit comments to *Proposed General Amendments to the WESM Manual on Metering Standards and Procedures regarding Metering Installation Requirements (ORCP- WM-26-04)*.

The Proponent, NGCP, seeks to improve the clarity, consistency, and practical implementation of the WESM Metering Standards and Procedures without altering the fundamental objectives of metering accuracy, security, and integrity. The amendments:

1. Incorporate the Philippine Electrical Code (PEC) and other applicable codes and standards under the general requirements for metering installations.
2. Adopt technology-neutral terminology to accommodate evolving technologies and compliant installation methods.
3. Introduce controlled flexibility for installations where compliance with certain physical requirements is impracticable due to installation constraints, subject to determination by the Metering Service Provider (MSP).
4. Strengthen metering security through documented verification requirements and recognition of equivalent tamper-evident measures.
5. Remove redundant requirements relating to secondary terminal box sealing.
6. Revise meter enclosure access provisions to allow controlled access by authorized personnel under MSP supervision while maintaining security controls.

The WESM document/s for amendment are the following:

1. [WESM Manual on Metering Standards and Procedures Issue 16.0](#)

DOCUMENTS:

Provided below are relevant materials for your reference and perusal:

- [Overview, Discussion Paper, and Matrix of Proposed Amendments](#)
- [Presentation of the Proposed Amendments](#)
- [RCC Form3 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 **05 October 2026** or 30 working days from the date of publication (20 August 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!



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

Name	[REDACTED] Market Surveillance Committee
Designation	[REDACTED]
Company	[REDACTED]
Company Address	[REDACTED] [REDACTED] [REDACTED]
Telephone No.	[REDACTED]
Email Address	[REDACTED]

Comments to the Proposed General Amendments to the WESM Manual on Metering Standards and Procedures regarding Metering Installation Requirements

Commenter	General Comments	Proponent's Response
	The Market Surveillance Committee (MSC) generally supports the proposed amendments to modernize the WESM Manual on Metering Standards and Procedures, align it with the Philippine Electrical Code (PEC), and adopt technology-neutral terminology. These updates reflect current industry practices and improve practical implementation. However, from a market surveillance and integrity perspective, the MSC emphasizes that any "controlled flexibility" granted to the Metering Service Provider (MSP)—particularly regarding the determination of tamper-evident measures, exemptions for visual traceability, and access control—must be strictly documented, transparent, and accessible for audit by the Market Operator (MO) and the WGC. Unilateral discretion by the MSP without adequate documentation or MO notification could create blind spots in market governance and complicate the verification of metering integrity. The MSC recommends adding explicit requirements for documentation and MO/WESM Governance Arm access to records to ensure that operational flexibility does not compromise settlement security.	

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Title	Section	Provision	Proposed Amendment	Rationale	Comments	Proposed Wording based on Comments	RCC Decision
General Requirements	2.1.1	This standard supplements the minimum requirements of the	This standard supplements the minimum requirements of the	The amendment incorporates the			

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		harmonized standards on the <i>WESM Rules</i> , PGC and PDC for the Grid and Distribution Metering Installations for the WESM. Any <i>Metering Installation</i> of a higher level accuracy or functionality than that by this standard may also be installed.	harmonized standards on the <i>WESM Rules</i> , PGC, and PDC, <u>PEC, and other applicable codes and standards governing</u> Grid and Distribution Metering Installations for the WESM. Any <i>Metering Installation</i> of a higher level accuracy or functionality than that by this standard may also be installed.	Philippine Electrical Code (PEC) and other applicable codes and standards within the general requirements to recognize their relevance to the design, installation, and operation of WESM metering installations. This provides a centralized reference to applicable standards and avoids the need for isolated references in specific provisions of the Manual.			
Applicability to Equipment	2.3.1	This standard applies to the following metering equipment, devices and accessories: a. xxx b. xxx c. xxx	This standard applies to the following metering equipment, devices and accessories: a. xxx b. xxx c. xxx	The amendment adopts technology-neutral terminology by referring to a "conduit system" rather than a "rigid conduit system," accommodating compliant installation methods while			

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		d. xxx e. xxx f. xxx g. xxx h. Rigid Conduit System in accordance with the Philippine Electrical Code (PEC); i. xxx j. xxx k. xxx l. xxx The equipment is used for the settlement of Philippine WESM administered transactions.	d. xxx e. xxx f. xxx g. xxx h. Rigid Conduit System in accordance with the Philippine Electrical Code (PEC); i. xxx j. xxx k. xxx l. xxx The <u>foregoing</u> equipment, <u>devices, and accessories</u> <u>is</u> <u>are</u> used for the settlement of Philippine WESM-administered transactions.	maintaining the required protection of metering circuits (see related proposal for Section 2.9.1.2). It also removes the standalone reference to the Philippine Electrical Code (PEC) from the applicability list, as references to applicable codes and standards are more appropriately addressed under the general requirements of the Manual, ensuring consistent application across all metering equipment.			
General Requirements for Grounding System	2.5.6.1.	The installation shall be in accordance but not limited to the following provisions of the Philippine Electrical Code: a. xxx	The installation shall be in accordance but not limited to the following provisions of the Philippine Electrical Code: a. xxx	The amendment updates the reference to the Philippine Electrical Code by replacing the specific edition with the			

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		b. xxx c. xxx d. xxx e. xxx f. xxx g. xxx h. xxx i. Connections to all bonded parts shall be made in accordance to Article 2.50.1.8 of the Philippine Electrical Code 2009 Part 1.	b. xxx c. xxx d. xxx e. xxx f. xxx g. xxx h. xxx i. Connections to all bonded parts shall <u>comply be made in accordance to Article 2.50.1.8 with the applicable provisions of the prevailing version</u> of the Philippine Electrical Code 2009 Part 1 .	prevailing version of the Code. This ensures continued alignment with the latest applicable electrical safety and installation standards without requiring future amendments to the Manual solely due to updates in the Code.			
Codes and Conditions	2.7.3.6.	cabling from the instrument transformers to the meter enclosure shall be routed in dedicated conduit, and the route shall be visually traceable; and"	cabling from the instrument transformers to the meter enclosure shall be routed in dedicated conduit, and the route shall remain visually traceable <u>(see Figure 4), except where impracticable due to physical installation</u>	A controlled exemption is provided for installations where visual traceability is inherently impracticable due to physical design constraints, such as	The MSC supports the exemption for visual traceability in GIS and legacy setups due to physical constraints. However, to safeguard market integrity, the MSP's determination of	(see Figure 4), except where impracticable due to physical installation constraints, <u>as determined by the Metering Services Provider (MSP)</u> , such as Gas Insulated Substations (GIS) and similar enclosed substation configurations, or	

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			<u>constraints, such as Gas Insulated Substations (GIS) and similar enclosed substation configurations, or due to legacy metering configurations associated with Energy Conversion Agreements (ECA) and other similar pre-WESM contractual arrangements, as determined by the Metering Service Provider (MSP); and</u>	Gas Insulated Substations (GIS) and similar enclosed substation configurations, or due to legacy metering configurations associated with Energy Conversion Agreements (ECA) and other similar pre-WESM arrangements. Such cases shall be subject to determination by the Metering Service Provider (MSP) to ensure that cable security and metering integrity are maintained.	this exemption must be formally documented and submitted to the MO and WESM Governance Arm for record-keeping. This ensures that any deviation from the standard visual traceability requirement is auditable and justified.	due to legacy metering configurations associated with Energy Conversion Agreements (ECA) and other similar pre-WESM contractual arrangements, as determined by the Metering Service Provider (MSP); and . <u>The MSP shall document the justification for any such exemption and submit the same to the Market Operator (MO) and the WESM Governance Arm for record and audit purposes; and</u>	
Communication Links for the Meter	2.8	The communication link to be installed for <i>metering installations</i> of facilities directly connected to the <i>transmission system</i> shall be a dedicated	The communication link to be installed for <i>metering installations</i> of facilities directly connected to the transmission system shall be a dedicated	The amendment removes references to specific telecommunications providers and legacy communication			

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		line for metering purposes (e.g. PLDT, Bayantel, Digitel lines or GSM Modem) of the MSP. The communication link to be installed for <i>metering installations of embedded generators</i> shall comply with the relevant provisions of the <i>Philippine Distribution Code</i>.	line for metering purposes (e.g. PLDT, Bayantel, Digitel lines or GSM Modem) of the MSP. The communication link to be installed for <i>metering installations of embedded generators</i> shall comply with the relevant provisions of the <i>Philippine Distribution Code</i> <u>and shall use an appropriate communication medium that meets the security and reliability requirements of the metering system.</u>	technologies in favor of technology-neutral language. This ensures that the provision remains applicable regardless of future developments in communication infrastructure while preserving the requirement for a dedicated communication link for metering purposes. It also adopts a uniform requirement for all metering installations, recognizing that the same communication security and reliability requirements apply regardless of whether the facility is directly connected to the transmission system			

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				or embedded within a distribution network.			
Instrument transformers connections	2.9.1.1	Primary and secondary cablings and connections shall be secure, tamper-resistant and compliant with the requirements of the prevailing PGC on security of registered revenue <i>metering installations</i> and metering data. Any ratio-tap changing facility which cannot be secured using a security seal or its equivalent shall not be permitted.	Primary and secondary cablings and connections shall be secure, tamper-resistant, and compliant with the requirements of the prevailing PGC on security of registered revenue <i>metering installations</i> and metering data. <u>Security of primary connections shall be established and maintained through documented verification during installation, commissioning, and maintenance activities, which may include photographs, inspection records, or other equivalent means.</u> <u>Secondary cablings and associated metering connections shall be provided with appropriate</u>	The amendment clarifies the application of security requirements to primary and secondary instrument transformer circuits. While primary connections are generally not suitable for physical sealing, their security may be established and maintained through documented verification during installation, commissioning, and maintenance activities. This provides a basis for detecting unauthorized modifications and	The MSC supports the use of documented verification (e.g., photographs, inspection records) for primary connections, as physical sealing is impracticable. However, these records are critical for detecting unauthorized modifications over the service life of the installation. The Manual must explicitly state that these verification records shall be made available to the MO and WESM Governance Arm upon request for surveillance and audit purposes.	Primary and secondary cablings and connections shall be secure, tamper-resistant, and compliant with the requirements of the prevailing PGC provisions on security of registered revenue metering installations and metering data Security of primary connections shall be established and maintained through documented verification during installation, commissioning, and maintenance activities, which may include photographs, inspection records, or other equivalent means. <u>Such documented verification records shall be maintained by the MSP and made available to the MO and WESM Governance</u>	

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			<u>security seals or equivalent tamper-evident measures.</u> Any ratio-tap changing facility which cannot be secured using a security seal or its equivalent shall not be permitted.	verifying the integrity of the metering installation over its service life. The amendment further clarifies that security sealing or equivalent tamper-evident measures apply to secondary metering circuits and associated connections, which are more susceptible to unauthorized access and potential metering interference. The requirement for ratio-tap changing facilities to be sealable is retained to preserve metering integrity and prevent unauthorized		<u>Arm upon request for audit and surveillance purposes.</u> Secondary cablings and associated metering connections shall be provided with appropriate security seals or equivalent tamper-evident measures. Any ratio-tap changing facility which cannot be secured using a security seal or its equivalent shall not be permitted.	

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				changes to metering parameters. Note: The proposed revision also takes into consideration the recommendations of the PEMC Independent Auditors in the 4th Review of Metering Installation Arrangements (RMIA).			
Conduit Systems	2.9.1.2	All wiring from the instrument transformers' secondary terminal box to the meter installation enclosure (meter box) shall be placed in a rigid conduit to ensure that the connections to cabling are secure and tamper-resistant. Conduit joints (elbow, T-connector) shall be properly sealed and secured. No secondary cabling shall be exposed and accessible to unauthorized personnel. Rigid conduit used for the instrument	All wiring from the instrument transformers' secondary terminal box to the meter installation enclosure (meter box) shall be installed in rigid <u>or flexible</u> conduit to ensure that the connections and to cabling are secure and tamper-resistant. <u>Flexible conduit, where used, shall be of heavy-duty industrial type and installed with appropriate fittings and mechanical protection.</u>	The amendment provides installation flexibility while maintaining the requirements for security, tamper resistance, and protection of metering secondary circuits. Flexible conduit, such as Liquid Flexible Metallic Conduit (FLMC), is commonly used in utility and industrial installations,			

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		transformer shall be surface mounted. See Figure 4.	Conduit joints (elbow, T-connector) shall be properly sealed and secured. No secondary cabling shall be exposed or accessible to unauthorized personnel. Rigid conduits used for the instrument transformer secondary wiring shall be surface mounted. See Figure 4.	particularly where rigid conduit is impracticable, including applications involving vibration, equipment movement, retrofit constraints, or limited installation space, provided that suitable industrial-grade materials, fittings, and mechanical protection are used. It is likewise suggested to delete "(meter box)" and "(elbow, T-connector)" to improve clarity, avoid overly prescriptive wording, and maintain a technology-neutral provision. The term "meter installation enclosure" is already sufficiently clear and			

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				comprehensive, while “conduit joints” already encompasses the applicable conduit fittings and connection components. It is further suggested to delete “Rigid conduits used for the instrument transformer secondary wiring shall be surface mounted. See Figure 4.” since the requirement has already been covered under Section 2.7.3.6, thereby avoiding redundancy within the Manual. Note: The proposed revision also takes into consideration the recommendations of the PEMC Independent Auditors			

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				in the 4th Review of Metering Installation Arrangements (RMIA).			
Secondary Terminal Box	2.9.1.3	Secondary Terminal Box Secondary terminal boxes of the current transformers and voltage transformers shall be sealed and placed as far as practicable to ensure the detection of unauthorized access to the instrument transformer connections. See Figure 1.	Secondary Terminal Box Secondary terminal boxes of the current transformers and voltage transformers shall be sealed and placed as far as practicable to ensure the detection of unauthorized access to the instrument transformer connections. See Figure 1.	The provision is no longer necessary as security requirements for instrument transformer secondary circuits and connections are addressed under Section 2.9.1.1. As secondary terminal boxes form part of the instrument transformer secondary connection assembly, a separate sealing requirement duplicates existing security provisions. Furthermore, the objective of facilitating the detection of unauthorized access is already addressed through the proposed security and tamper-			

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				evident requirements under Section 2.9.1.1.			
Meter Enclosure	2.9.1.4 2.9.1.3	All meters, test links, and communication equipment shall be contained within a meter enclosure similar to Figure 5. a. Meter Enclosure Requirements The meter enclosure shall comply with the following requirements: i. xxx ii. xxx iii. Persons other than the meter service provider shall not be given access to the meter enclosure. iv. The meter enclosure shall be padlocked and sealed as far as practicable in a manner approved by the MO.	All meters, test links, and communication equipment shall be contained within a meter enclosure similar to Figure 5. a. Meter Enclosure Requirements The meter enclosure shall comply with the following requirements: i. xxx ii. xxx iii. <u>Access to the meter enclosure by persons other than the Metering Service Provider shall only be allowed under MSP control or supervision.</u> Persons other than the meter service provider shall not be	iii. The amendment introduces operational flexibility while maintaining security control. The original absolute restriction does not account for legitimate access by authorized personnel, such as auditors or	Allowing access under MSP supervision is acceptable. However, to maintain a strict chain of custody and audit trail, an access log must be maintained to record the identity of authorized personnel, the purpose of access, and the time of entry/exit. Furthermore, regarding item (iv), shifting the sole discretion of sealing methods to the MSP ("as determined by the MSP") may hinder the MO's and WESM Governance Arm's ability to verify tamper-evident measures during	iii. Access to the meter enclosure by persons other than the Metering Service Provider shall only be allowed under MSP control or supervision. <u>An access log detailing the identity of the personnel, purpose, and time of access shall be maintained and kept</u>	

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		V. XXX	given access to the meter enclosure. iv. The meter enclosure shall be padlocked and sealed as far as practicable in a manner approved by the MO <u>secured using padlocks, security seals, or equivalent tamper-evident measures, as determined by the MSP.</u> V. XXX	regulators, when undertaken under the supervision or control of the MSP. iv. The amendment aligns responsibility for meter enclosure security with the Metering Service Provider, consistent with the PGC requirements on security of metering facilities. It also clarifies the requirement by allowing equivalent tamper-evident measures and removing ambiguity regarding requirement for MO approval and method of implementation.	audits. The MSP should be required to notify the MO of the specific sealing protocols employed.	<u>within or adjacent to the meter enclosure.</u> iv. The meter enclosure shall be secured using padlocks, security seals, or equivalent tamper-evident measures, as determined by the MSP. <u>The MSP shall notify the MO of the specific tamper-evident measures and sealing protocols employed to ensure alignment with MO and WESM Governance Arm audit and verification procedures.</u> V. XXX	

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Meter Test Block/Switch	2.9.1.5 2.9.1.4	xxx	xxx	Proposed renumbering in line with the proposed deletion of Section 2.9.1.3			
Meter Seals and Padlock	2.9.1.6 2.9.1.5	xxx	xxx	Proposed renumbering in line with the proposed deletion of Section 2.9.1.3			
Metering Perimeter	2.9.1.7 2.9.1.6	xxx	xxx	Proposed renumbering in line with the proposed deletion of Section 2.9.1.3			