**Name of Stakeholder: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**WESM Manual Registration, Suspension and De-registration Criteria and Procedures**

| **Section** | **Original Provision** | **Proposed Amendment** | **Rationale** | **Comment /**  **Proposed Revision** | **Rationale** |
| --- | --- | --- | --- | --- | --- |
| (New - inserted) | (New - inserted) | **2.5.5 Registration Phases** | Generation companies at different stages of the development of their generating facilities (i.e., construction, test and commissioning, commercial operations) participate in the WESM in different ways and, hence, will need to submit different requirements. This section is proposed to introduce stages of registration corresponding to those development stages. |  |  |
| (New - inserted) | (New - inserted) | **2.5.5.1 An *Applicant* wishing to register as a *Generation Company* or a *generating system* as an additional *facility* shall start its registration from one of the following phases:**   1. **If the *Applicant* needs to withdraw power from the *transmission system* for the construction and development of its *generating system* and for station use during such period, the Applicant shall undergo Backfeed Registration. The facility of the *Applicant* shall be included in the *market network model* as load resource at this phase.** 2. **If the *Applicant* needs to conduct the necessary test and commissioning process as required by the *PGC*, the *Applicant* shall undergo Test and Commissioning Registration. For this purpose, Test and Commissioning shall refer to the generating unit’s connection / synchronization to the grid.** 3. **If the *Applicant* commences actual commercial operations, the *Applicant* shall undergo Commercial Operation Registration.** | This proposed section provides the different phases and the criteria for each phase. In general, the difference of each phase are as follows:   * a GenCo under Backfeed Registration will be modelled as a load facility; * a GenCo under Test and Commissioning Registration will be modelled as a generation resource but cannot submit offers to the market; and * a GenCo under Commercial Operations Registration will be modelled as a generation resource and can submit offers to the market. |  |  |
| (New) | (New) | **2.5.5.2 An *Applicant* planning to register as a *Customer* or a load *facility* shall start its registration at the Commercial Operation Registration phase.** | Unlike generating facilities, load facilities participate in the market in only one manner (i.e., non-dispatchable load); hence, it is proposed that Customers register only under Commercial Registration phase. |  |  |
| 2.5.5  2.5.5.1 | 2.5.5 Assessment of Applications  2.5.5.1 Submission and Preliminary Assessment of Applications  xxx | 2.5.~~5~~**6** Assessment of Applications  2.5.~~5~~**6**.1 Submission and Preliminary Assessment of Applications  xxx | Re-numbered with the proposed introduction of the registration phases. |  |  |
| 2.5.5.1(a) | Applications for registration shall be submitted to the *Market Operator* together with documents and information required by the *Market Operator* to prove compliance with the membership criteria and requirements for registration. | * + - 1. **2.5.6.1**   a) Applications for registration shall be submitted to the *Market Operator* together with documents and information required by the *Market Operator* to prove compliance with the membership criteria and requirements for registration. **An *Applicant* shall submit a separate application for registration in each applicable phase. Documents and information submitted during its registration for a prior phase may be used in succeeding applications, provided that the *Applicant* shall update the same as of the date of the filing of the separate application, if necessary.** | To clarify that separate application for each registration phase will be required; however, their submitted documents and information from the previous phase will already be honored in the next phases. |  |  |
| 2.5.5.1 (d) | If the facilities being registered are not yet represented in the prevailing WESM Market Network Model, the Market Operator shall, in consultation with the System Operator and the Applicant, determine the appropriate representation for the said facility. It shall then update the WESM Market Network Model following the procedures set forth in relevant market manuals. | ~~2.5.5.1~~ **2.5.6.1**  d) If the facilities being registered are not yet represented in the prevailing *WESM Market Network Model*, the *Market Operator* shall, in consultation with the *System Operator* and the *Applicant*, determine the appropriate representation for the said facility **based on the registration phase of the *Applicant***. It shall then update the *WESM Market Network Model* following the procedures set forth in relevant market manuals. | Re-numbered with the proposed introduction of the registration phases.  To clarify that the applicant may be differently represented in the Market Network Model (MNM) depending on the registration phase of the applicant (i.e., as a load during backfeed, and as generator during test and commissioning and commercial operations). |  |  |
| (New) | (New) | ~~2.5.5.1~~ **2.5.6.1**  **e) The *Applicant* shall execute a market participation agreement in the form prescribed by the *Market Operator* and PEMC*.*** | To reflect current practice that signed Market Participation Agreement is being submitted by applicants before the Notice of WESM Approval to ensure compliance of the applicant with the WESM Rules and Manuals |  |  |
| (New) | (New) | ~~2.5.5.1~~ **2.5.6.1**  **f) An *Applicant* as a *Generation Company* shall comply with the authorization requirement under Section 2.5.3.1 based on its registration phase as follows:**   * 1. **Backfeed Registration. *Applicant* shall submit a receiving copy of its application with the ERC for a Certificate of Compliance, together with Form 7 (General Plant Description) duly stamped “received” by the ERC.**   2. **Test and Commissioning Registration. *Applicant* shall submit the scheduled date of Test and Commissioning, as coordinated with the *Network Service Provider\** and *System Operator*, for the conduct of test and commissioning. Prior to the actual conduct of test and commissioning, the *Generation Company* shall furnish the *Market Operator* and *System Operator* a copy of its Provisional Certificate of Approval to Connect (PCATC), with additional Clearance to energize from the *Network Service Provider* for *embedded generators*. The test and commissioning period of the *Applicant* shall be as indicated in the Provisional Certificate of Approval to Connect. Applicant shall submit a receiving copy of its application with the ERC for a Certificate of Compliance, together with Form 7 (General Plant Description) duly stamped "received" by the ERC if this was not yet submitted. In case of extended period for Test and Commissioning, the *Applicant* shall submit to the *Market Operator* the corresponding extended PCATC three (3) *working days* from the original expiry date of PCATC indicating the approved period for the extended conduct of Test and Commissioning.**   *Add footnote:* ***\*Per DOE Department Circular No. 2021-06-0013, Network Service Providers include Transmission Network Providers and Distribution Utilities***   * 1. **Commercial Operations Registration. *Applicant* shall submit either a Certificate of Compliance or Provisional Authority to Operate (PAO).** | This section provides the proposed unique documentary requirement for each phase, which are aligned with DOE DC 2021-06-0013:   1. a GenCo registering under Backfeed Registration will be required to submit proof that its registration as a load is towards operation of a generating facility; 2. a GenCo registering under Test and Commissioning Registration will be required to submit proof that it is allowed by the TNP or DU (via the PCATC) to inject power to the grid for test and commissioning, as well as proof of its application with the ERC to secure COC; and 3. a GenCo registering under Commercial Operations Registration will be required to submit proof that it is allowed to sell power by the ERC. |  |  |
| (New) | (New) | ~~2.5.5.1~~ **2.5.6.1**  **g) Registration Fees. During its first registration phase, the *Applicant* shall pay to the *Market Operator* a registration fee, as may be approved by the ERC, to cover the cost incurred for the assessment of the application, training of the participants and installation and maintenance of digital certificates.** | It is proposed that the registration fee be settled by the applicant on the first stage of its application for WESM Membership to cover the cost incurred in the whole duration of the application process including registration assessment, training of the participants, and installation and maintenance of the digital certificates. |  | Removed the strikethrough in-between the highlighted texts |
| (New) | (New) | ~~2.5.5.1~~ **2.5.6.1**  **h) Participant Interface Access. During the Test and Commissioning registration phase, the *Applicant* may subscribe to and allow the *Market Operator* to apply or install a method employing encryption in its computers to provide secure access to the *Market Management System*. The *Applicant* shall have read-only access to its facility during the Test and Commissioning phase to enable the *Trading Participant* to view its generating unit’s schedules. Meanwhile, full access to its facility will only be enabled by the *Market Operator* no later than eight (8) calendar days from approval of the *Applicant’s* Commercial Operations registration.** | To clarify that the Participant Interface Access may be installed as early as the test and commissioning registration phase of the applicant, however, the system access will only be enabled on the start of the applicant’s commercial operations. |  |  |
| 2.5.6.1(b) | Determines that the applicant is eligible to be registered in the category or categories in which it is applying for registration. | ~~2.5.6.1~~ **2.5.7.1**  xxx  (b) Determines that the applicant is eligible to be registered in the category or categories **and phase** in which it is applying for registration.  xxx | To clarify that determination of eligibility of the applicant for the approval of application will be based on the category and phase that the applicant is applying for. This will guarantee that eligibility will be determined based on the requirements per registration phase and that the applicant will be assessed and approved per phase. |  |  |
| 2.5.6.2 | 2.5.6.2. Notice of Approval    a) For approved applications, the Market Operator shall send a notice of approval to the Applicant within fifteen (15) days from completed submission by the applicant of the required application forms and supporting documents and information. The failure of the Market Operator to act on the application within this period shall not be deemed an approval of the application.    b) The registration of the Applicant shall take effect on the date specified in the notice of approval which shall be a date not more than seven (7) days after the Market Operator sends the notice of approval or on the date when the Applicant complies with all the requirements provided under Clause 5.6.3 of this Manual, whichever is later. Subject to concurrence by the Market Operator, the effective date may be set on another date requested by the Applicant. | ~~2.5.6.2~~ **2.5.7.2** Notice of Approval  a) For approved applications, the *Market Operator* shall send a notice of approval **as a *WESM Member* at the applied registration phase** to the *Applicant* within fifteen (15) **calendar** days from completed submission by the applicant of the required application forms and supporting documents and information. The failure of the *Market Operator* to act on the application within this period shall not be deemed an approval of the application.  **b) The notice of approval of the Backfeed Registration shall indicate the effective date thereof, which date shall not be more than three (3) working days after the transmittal of the notice of approval by the *Market Operator*.**  **c) The notice of approval of the Test and Commissioning Registration shall indicate the effective date thereof, which date shall not be more than three (3) working days after the transmittal of the notice of approval by the *Market Operator*.**  ~~b)~~ **d)** The ~~registration of an Applicant~~ **notice of approval of the Commercial Operations Registration** shall ~~take effect on the date specified in the notice of approval which shall be a date not more than seven (7) days after the Market Operator sends the notice of approval or on the date when the Applicant complies with all the requirements provided under Clause 5.6.3 of this Manual, whichever is later. Subject to concurrence by the Market Operator, the effective date may be set on another date requested by the Applicant.~~ **indicate the effective date thereof, which date shall not be more than eight (8) calendar days after the transmittal of the notice of approval by the *Market Operator*.** | The proposal was proposed to introduce the issuance of the notice of approval per registration phase with the corresponding timeline to be followed per phase. Since each registration phase has different requirements and impact in the WESM, the issuance of notice of approval is proposed to have different timelines per phase.  Re-numbered with the proposed introduction of the registration phases |  |  |
| 2.5.6.3 | 2.5.6.3 Other Requirements for Approved Application  The Applicant whose application has been approved shall also comply with the following as conditions to and before the effectivity of its membership in the WESM –  a) Market Participation Agreement. The Applicant shall execute a market participation agreement in the form prescribed by the Market Operator.  b) Participant Interface Access. The Applicant shall subscribe to and allow relevant digital certificates issued by the Market Operator to be installed in its computers in order for it to be permitted access to the WESM Market Management System.  c) Registration Fees. Subject to approval by the ERC of the amount to be recovered, the Applicant shall pay to the Market Operator a registration fee to cover cost incurred for the assessment of the application, training of the participants and installation and maintenance of digital certificates. If the Market Operator incurs additional costs as a result of requesting and assessing additional information, it may require the applicant to pay the actual amount incurred to cover those additional costs. | ~~2.5.6.3~~ **2.5.7.3** ~~Other Requirements for Approved Application~~ **Guidelines for Test and Commissioning Registration**  ~~The Applicant whose application has been approved shall also comply with the following as conditions to and before the effectivity of its membership in the WESM –~~  ~~a.) Market Participation Agreement. The Applicant shall execute a market participation agreement in the form prescribed by the Market Operator.~~  ~~b) Participant Interface Access. The Applicant shall subscribe to and allow relevant digital certificates issued by the Market Operator to be installed in its computers in order for it to be permitted access to the WESM Market Management System.~~  ~~c) Registration Fees. Subject to approval by the ERC of the amount to be recovered, the Applicant shall pay to the Market Operator a registration fee to cover cost incurred for the assessment of the application, training of the participants and installation and maintenance of digital certificates. If the Market Operator incurs additional costs as a result of requesting and assessing additional information, it may require the applicant to pay the actual amount incurred to cover those additional costs.~~  **a) The generating unit of the *WESM Member* shall be allowed to declare bilateral contract quantities and be entitled to WESM payments for its generated output only within the test and commissioning period indicated in the valid Provisional Certificate of Approval to Connect issued by the *Network Service Provider* or upon completion of the conduct of test and commissioning, if completed earlier.** **Generation beyond the authorized test and commissioning period shall not be allowed to be declared as a bilateral contract quantity and shall not be entitled to WESM payments. Any net surplus as a result of injected energy from unauthorized test and commissioning activity will be treated in accordance with *WESM Rules* Clause 3.13.16. However, the *WESM Member* shall still be charged for all withdrawals from the grid for the conduct of its test and commissioning activities.**  **b) The *Market Operator* shall notify the *WESM Member***, **copy furnished the *System Operator,* of the expiration of its Provisional CATC fifteen (15) calendar** **days prior to the date of expiry. The *System Operator* shall no longer impose over-riding constraints on the *generating unit* once the test and commissioning period ends.**  **c) The *WESM Member* may submit an extended Provisional Certificate Approval to Connect** **to *Market Operator* and *System Operator* for the extension of its test and commissioning period within three (3) working days prior to original expiry date. Any unauthorized generation shall not be allowed to be declared as bilateral contract quantity and shall not be entitled to *WESM* payments in accordance with Section 2.5.7.3(a). In case of failure to submit the extended PCATC to the *Market Operator* within three (3) working days prior to the original expiry date, the PCATC shall be deemed without effect after the expiry date.**  **d) The *Network Service Provider* shall immediately inform *Market Operator* of any suspended validity of PCATC due to failure of the generating facility to satisfy the grid connectivity parameters required by the PGC. Suspended PCATC shall observe Section 2.5.7.3 (a). Notwithstanding the suspension of the PCATC, an Extended PCATC shall be submitted within three (3) working days prior to original expiry of PCATC. Should the PCATC expire while the *WESM Member* is in the process of satisfying the grid connectivity parameters required by PGC or PDC, the process for the conduct of Test and Commissioning shall be reset.**  **e)** **In case of changes in capacity and capabilities of the generating unit arising from the results of test and commissioning, the *WESM Member* shall immediately inform the *Market Operator* for the purpose of updating its registration details.**  **f) The *Network Service Provider* of a generating unit shall furnish the ERC and *Market Operator* a copy of the Final Certificate of Approval to Connect within three (3) calendar days from issuance thereof to the relevant *WESM Member*.**  **g) The *WESM Member* of a *generating unit* shall submit to the *Market Operator* an application for Commercial Operations Registration within three (3) *working days* from receipt of its Certificate of Compliance or Provisional Authority to Operate (PAO).** | The proposal seeks to set guidelines on the conduct of the test and commissioning aligned with DOE DC 2021-06-0013. The following guidelines will clarify the requirements, timelines and corresponding effects for non-compliance to the requirement. This aims to eliminate the existence of unauthorized prolonged test and commissioning activity of a generating unit.  This also clarifies that any amount resulting from non-payment of unauthorized test and commissioning activity will be treated in accordance with the provisions of the WESM Rules.  Re-numbered with the proposed introduction of the registration phases |  |  |
| 2.5.7 | 2.5.7 Non-Approval of Applications/Remedies | ~~2.5.7~~ **2.5.8** Non-Approval of Applications/Remedies | Re-numbered with the proposed introduction of the registration phases |  |  |
| 2.9 | 2.9.1 As condition to continuing membership in the WESM, all registered WESM members shall ensure their continuing compliance with the membership criteria and technical and commercial requirements set forth in the WESM Rules and this Manual. | 2.9.1As condition to continuing membership in the WESM, all registered WESM members shall ensure their continuing compliance with the membership criteria, and technical and commercial requirements set forth in the WESM Rules and this Manual **without the need for reminder from the *Market Operator***. | The proposal was proposed to require the trading participants to submit registration documents as part of continuing compliance without the need for Market Operator to remind them. |  |  |
| 3.3.6.2 | The registered *Generation Company* shall comply with the technical and commercial requirements under Section 2.5.3 and the procedures under Section 2.5.4 for the registration of its new facility. | The registered *Generation Company* shall comply with the technical and commercial requirements under Section 2.5.3 and the procedures under Section**s** 2.5.4**, 2.5.5, 2.5.6 and 2.5.7** for the registration of its new facility. | To guide Trading Participants on the relevant provisions for registering new facilities. |  |  |
| 3.3.6.3 | The *Market Operator* shall assess and approve the request for the registration of new *facility* in accordance with the procedures under Sections 2.5.5, 2.5.6, and 2.5.7. | The *Market Operator* shall assess and approve the request for the registration**, on applicable phases,** of new *facility* in accordance with the procedures under Sections 2.5.5, 2.5.6, and 2.5.7. | To emphasize the registration phases, each with corresponding requirements and timelines, where the Market Operator shall assess the registration applications. |  |  |
|  | (New) | **Test and Commissioning**  **Refers to the conduct of procedures to determine and certify that a generating unit was connected to the grid in accordance with the Philippine Grid Code (PGC), Philippine Distribution Code (PDC) and other relevant guidelines and specifications and to determine readiness to deliver energy to Grid or distribution network for the purpose of securing a COC from the ERC.** | To provide a general definition for the term ‘test and commissioning’ adopted from DOE Department Circular No. 2021-06-0016, for purposes of WESM registration. |  |  |