

Comments on the Interim Mindanao Dispatch Protocol

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
MINDANAO DISPATCH PROTOCOL Version: January 2017	PIPPA	Suggest to revise as follows: ANNEX A INTERIM MINDANAO DISPATCH PROTOCOL (PRIOR TO IMPLEMENTATION OF WESM)	Revised as follows: ANNEX B INTERIM MINDANAO DISPATCH PROTOCOL (PRIOR TO IMPLEMENTATION OF WESM)
	NGCP	Suggest to revise as follows: Interim Mindanao Dispatch Protocol (prior to implementation of WESM)	
	PEMC	If this protocol be changed, will this undergo rules change process like the existing Dispatch Protocol for the WESM? Suggest to establish such process re rules change.	
1.0 Purpose and Scope		No comments received.	
1.1 Purpose The purposes of this Protocol are to:	PIPPA	Suggest to revise as follows: The purposes of this Revised Mindanao Dispatch Protocol ("Dispatch Protocol") are to:	Adopted as follows: The purposes of this Interim Mindanao Dispatch Protocol ("Dispatch Protocol") are to:

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a. Comply Section 3.1 of Department Circular No. _____ DECLARING THE LAUNCH OF THE WHOLESALE ELECTRICITY SPOT MARKET (WESM) IN MINDANAO AND PROVIDING FOR TRANSITION ARRANGEMENTS;		No comments received.	
b. Provide detailed information and timeline on the Generation Day-Ahead Nomination and Scheduling and Implementation Process;	PIPPA	Suggest to revise as follows: Provide detailed information and timeline on the Dispatch Criteria, Dispatch Scheduling and Real-time Dispatch	Adopted as follows: Provide detailed information and timeline on the Generation Day-Ahead Nomination and Scheduling and Implementation Process;
	NGCP in response to PIPPA's comment	Retain NGCP's original provision	
c. Determine the Dispatch Order of Priority of Generating units per type of technology;		No comments received.	
d. Formulate the Generation to Maintain Matrix;		No comments received.	
e. Implementation of Generation Schedule and Dispatch Instructions.	PIPPA	Suggest to revise as follows: Implement Generation Schedule and Dispatch Instructions;	Revised as follows: a. Implement Generation Schedule and Dispatch Instructions thru dispatching of

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			quantities covered by bilateral contracts, except during Grid emergency as provided for in the Philippine Grid Code (PGC);
	PIPPA	Suggest to add provision as follows: Implement monthly reconciliation on Nominations, Actual Schedules, Metered Quantities, System Losses and Imbalances;	Adopted as follows: e. Implement monthly reconciliation on Nominations, Actual Schedules, Metered Quantities, System Losses and Imbalances as provided for in the guidelines for consolidating and transmitting to the Generators (GENs) and Load End Customers (CUSTOMERs) their respective metering data.
	NGCP in response to PIPPA's comment	Implementation of monthly reconciliation of nomination is not the mandate of NGCP as System Operator. Under Section 9 of RA 9136, NGCP's mandate is to ensure and maintain the reliability, adequacy, security, stability and integrity of the grid in accordance with the Philippine Grid Code, and provide central dispatch of all generation facilities connected, directly or indirectly, to the transmission system taking into account outstanding bilateral contracts.	
1.2 Scope This dispatch protocol shall apply to the following entities in Mindanao Grid also known as the Grid Users:	PIPPA	Suggest to revise as follows: This Dispatch Protocol shall apply to the following entities in the Mindanao Grid, also known as the Grid Users:	Adopted as follows: This Dispatch Protocol shall apply to the following entities in the Mindanao Grid, also known as the Grid Users:
	First Gen	Kindly include section the DEFINITION OR DEFINITION OF TERMS, consistent with EPIRA & PGC.	
a. System Operator (SO);		No comments received.	

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b. All Generators (GENs) whether Grid Connected, Renewables, Embedded and Merchant Plants and their respective Trading Group if any;	PIPPA	Suggest to revise as follows: All Generators (GENs) whether Grid Connected, Renewables, Embedded and Merchant Plants; For the avoidance of doubt, GENs shall also include all PSALM/NPC owned, operated or contracted (IPP) plants;	Revised as follows: b. All GENs, Grid Connected and Embedded Generator. For the avoidance of doubt, GENs shall also include all Power Sector Assets and Liabilities Management Corporation (PSALM)/National Power Corporation (NPC) owned, operated or contracted Independent Power Producers (IPP) Plants; and
c. All Load End Customers (CUS). Customers include Distribution Utilities, Private Utilities, Industrial Customers and Directly Connected Customers.	PIPPA	Suggest to revise as follows: All Load End Customers (CUSTOMERS). CUSTOMERS include Distribution Utilities, Industrial Customers and Directly Connected Customers.	Revised as follows: c. All CUSTOMERs to include Distribution Utilities (DUs) and Directly Connected Customers.
2.0 General Requirements		No comments received.	
2.1 All Generators and their respective Trading Groups shall establish reliable communication facilities at all-time to allow proper coordination between the Generators and the System Operator.	PIPPA	Suggest to revise as follows: The SO and all GENs shall establish reliable communication facilities at all times to allow proper coordination between GENs and the SO.	Revised as follows: 2.1 The SO and all GENs shall establish reliable communication facilities to allow proper coordination between GENs and the SO.

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2.2 All Distribution Utilities, Private Utilities, Industrial Customers and Directly Connected Customers shall establish reliable communication facilities at all-time to allow proper coordination between the Customers and Generators, Customers the System Operator.	PIPPA	Suggest to revise as follows: The SO and all CUSTOMERS shall establish reliable communication facilities at all times to allow proper coordination between the CUSTOMER and the SO.	Revised as follows: 2.2 The SO and all CUSTOMERs shall establish reliable communication facilities at all times to allow proper coordination between the CUSTOMERs and the SO.
	NGCP in response to PIPPA's comment	For clarity, retain NGCP's original provision	
2.3 If these facilities fail, the affected parties shall quickly try to establish contact via any other means like fax, mobile phone, email, etc.	PIPPA	Suggest to revise as follows: If the established communication facilities between the GENs/CUSTOMERs and the SO fail, the affected parties shall quickly try to establish contact via any other means such as fax, mobile phone, email, etc.	Adopted as follows: 2.3 If the established communication facilities between the GENs/CUSTOMERs and the SO fail, the affected parties shall quickly try to establish contact via any other means such as facsimile, mobile phone, or electronic mail.
2.4 All GENs whether Grid Connected or Embedded must have real-time monitoring for Central Dispatch.	First Gen	Is this an online system?	Yes.
	PIPPA	Suggest to add provision as follows: The GENs and its CUSTOMERS shall agree on a nomination and settlement protocol consistent with this Dispatch Protocol;	Revised as follows: 2.4 All GENs whether Grid Connected or Embedded must have real-time monitoring for Central Dispatch.

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3.0 Operational Responsibilities			
3.1 System Operator (SO) The SO shall be responsible for:		No comments received.	
	PIPPA	Suggest to add provision as follows: Ensuring communication facilities, such as PLC phones, are in proper working order;	Addressed in Section 2.0 General Requirements of the revised Interim Mindanao Dispatch protocol. 2.3 If the established communication facilities between the GENs/CUSTOMERs and the SO fail, the affected parties shall quickly try to establish contact via any other means such as facsimile, mobile phone, or electronic mail.
3.1.1 Central Dispatch, Scheduling of Generation Facilities and issuing Dispatch Instructions to industry participants (considering the Energy Demand, operating reserve requirements, Security Constraints, Outages and other Contingency plans) to achieve economic operation while maintaining Power Quality, Reliability and Security of the Grid.	NAPOCOR	Insert the phrase after Outages "transmission limits and.."	The term is already covered by security constraints.
	Alsons Power and DASURECO	There are no parameters for the "economic operations." This is improper delegation of power to NGCP to set what are considered economic operations. Certainly, the franchise of NGCP does not include this power. Is this an amendment to NGCP's franchise?	Revised in 3.1 System Operator as follows: <i>xxx</i> <i>The SO shall be responsible for Central Dispatch, Scheduling of Generation Facilities and issuing Dispatch Instructions to industry participants (considering the Energy Demand, Operating Reserve Requirements, Security Constraints, Outages and Other Contingency Plans) to achieve power quality, reliability and security of the Grid.</i>

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			xxx
3.1.2 Consolidating the System Generation Requirement based on the submitted demand forecast of the customer;	PIPPA	<p>Suggest to revise as follows:</p> <p>Preparing Day-Ahead demand forecast per CUSTOMER based on SO's Generation Load Forecasting tool and providing each CUSTOMER the same;</p>	<p>Addressed in Section 3.1 System Operator of the revised Interim Mindanao Dispatch protocol as follows:</p> <p><i>The SO shall be responsible for Central Dispatch, Scheduling of Generation Facilities and issuing Dispatch Instructions to industry participants (considering the Energy Demand, Operating Reserve Requirements, Security Constraints, Outages and Other Contingency Plans) to achieve power quality, reliability and security of the Grid.</i></p> <p><i>Specifically, while WESM is not yet in place in Mindanao Grid, the SO shall:</i></p> <p><i>a. Generate and publish its Day-Ahead System Demand Forecast based on historical data and demand pattern;</i></p> <p><i>b. Generate and publish its GMMT (Attachment 1) based on Day-Ahead Nominated Capacity for Energy from the GENs based on CUSTOMERs allocation;</i></p> <p>xxx</p>
	NGCP in response to PIPPA's comment	<p>For clarity. SO only prepares System Demand Forecasting to be able to come up with a Day Ahead Generation schedule with due consideration to the Order-of priority per type of technology.</p> <p>NGCP to amend the original provision. Consolidating the nominated Generation requirements based on the allocated customers demand forecast.</p>	

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3.1.3 Evaluating and assessing the submitted customers' demand based on SO's Generation Load Forecasting tool;	First Gen	<p>The evaluation/assessment should be documented. The SO's forecasting tool efficiency should be evaluated. Inform the Customer on the result of the evaluation and assessment.</p> <p>Include also the other WESM participants such as the Load End Customers in the dissemination of the generation schedule so they can manage their load esp if and when they have a supply deficiency. Updates shall also be given in case of GENs re-nomination.</p>	<p>Addressed in Section 3.1 System Operator of the revised Interim Mindanao Dispatch protocol as follows:</p> <p><i>The SO shall be responsible for Central Dispatch, Scheduling of Generation Facilities and issuing Dispatch Instructions to industry participants (considering the Energy Demand, Operating Reserve Requirements, Security Constraints, Outages and Other Contingency Plans) to achieve power quality, reliability and security of the Grid.</i></p> <p><i>Specifically, while WESM is not yet in place in Mindanao Grid, the SO shall:</i></p>
	PIPPA	<p>Suggest to revise as follows:</p> <p>After verification by the CUSTOMER of the demand forecast provided by the SO per 3.1.2, consolidating the System Generation Requirement based on the submitted verified demand forecast of each CUSTOMER and stacking of CUSTOMER's contracted capacities;</p>	
	NGCP in response to PIPPA's comment	<p>For clarity. The customers may use the day-ahead projected demand forecast of NGCP as reference when they forecast customer demand. The customers shall then submit their respective demand forecast to their contracted Generators while the Generators after consolidating the allocation of their customers' requirements shall then nominate to System Operator their Generation to maintain matrix based on their respective customer load allocation.</p> <p>The System Operator shall consolidate the nominated generation schedules of all Generators with their respective load allocation of customers</p>	<p>a. <i>Generate and publish its Day-Ahead System Demand Forecast based on historical data and demand pattern;</i></p> <p>b. <i>Generate and publish its GMMT (Attachment 1) based on Day-Ahead Nominated Capacity for Energy from the GENs based on CUSTOMERs allocation;</i> xxx</p>

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		<p>and shall establish a generation to maintain matrix for the day ahead.</p> <p>Retain NGCP's original provision.</p>	
<p>3.1.4 Preparing Week-Ahead Generation Schedule and Day-Ahead Generation Schedule of all GENs shall be based on System Demand Forecast</p>	PIPPA	<p>Suggest to revise as follows:</p> <p>Preparing Week-Ahead Generation Schedule and Day-Ahead Generation Schedule of all GENs, based on CUSTOMER nominations;</p>	<p>All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.</p>
	NGCP in response to PIPPA's comment	<p>For clarity. Retain NGCP's original provision since SO applies the System Demand Forecasting in the preparation of Week-Ahead and Day Ahead which are based on the SO's Order-of Priority and not on Customers Demand Forecast. The NCGP is not equipped in forecasting the Customers demand because the forecasting of customer's demand is the responsibility of each customer under Section 23 of RA 9136.</p> <p>The PGC requires the DUs/ECs to do the customer load forecasting and submits to SO for reference.</p>	
	PIPPA	<p>Suggest to add provision as follows:</p> <p>Central Dispatch/Issuing of dispatch instructions to GENs at real-time based on nominations of CUSTOMER;</p>	<p>Addressed in Section 3.1 (c) System Operator and Section 7.1 Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch protocol.</p>
	NGCP in response to PIPPA's comment	<p>For clarity. The System Operator shall be guided with the Day Ahead Generation schedule based on the system demand forecast and at the same time shall use the Generation-to maintain matrix as reference during the In-day dispatching. The System Operator shall issue re- dispatch instructions when there's imbalance in the supply</p>	

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		and demand. As much as possible, the CUS shall re-nominate if the actual is different from the nomination and the GENS shall submit re-nomination to System Operator to ensure no imbalance during in-day dispatching.	
3.1.5 Formulating the Dispatch Order of Priority, Generation to Maintain Matrix Table with consideration of Generators' Bilateral Power Supply contracts to customers;	PIPPA	Suggest to revise as follows: Formulating the Dispatch Order of Priority, Generation to Maintain Matrix Table based on the GENS' Bilateral Power Supply contracts to CUSTOMER;	Addressed in Section 3.1 (b) System Operator, Section 4.2 Dispatch Order of Priority, Section 5.0 Generation to Maintain Matrix Table, and Section 6.2 Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch protocol.
	Alsons Power and DASURECO	<p>What is the legal basis of the System Operator's (SO) authority to formulate dispatch order of priority? NGCP, as the SO, should not be allowed to formulate dispatch order of priority. Its obligations are limited to the technical aspect of dispatch. The formulation of dispatch order of priority is not a technical matter. It is economic and policy-based.</p> <p>This also violates the law because the EPIRA states that the market operator will prepare the dispatch schedule and give it to the transmission operator to implement.</p> <p>It is not the transmission operator who will decide the dispatch.</p> <p>This is in provide in Section 9 e of the EPIRA: '(e) Subject to technical constraints, the grid operator of the TRANSCO shall provide central dispatch of all generation facilities connected, directly or indirectly, to the transmission system in accordance with the dispatch schedule submitted by the market operator,</p>	

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		<p>taking into account outstanding bilateral contracts; and'</p> <p>In giving NGPC the responsibility to formulate dispatch order of priority, the DOE indirectly expand the power included in the franchise granted to NGCP.</p> <p>There are no parameters on the extent that NGCP should consider the bilateral power supply contracts. Under the present draft, it appears that NCP is given the power to impair the said contracts.</p> <p>There should be checks and balances on the dispatch order. Otherwise, NGCP is free to do whatever it likes and can easily abuse its authority. It should be noted that at the end of the day, it is the consumers who will bear the burden of the industry participants' actions. It is only but proper and absolutely necessary that consumers should be well-protected.</p> <p>NGCP is a private company, and is not mandated to serve the public interest. In fact, it has its own private interests to promote. It is critical that the public and the industry participants are protected so as to ensure truly free and fair competition in the market which is hoped to bring power prices down.</p> <p>Moreover, the SO should be penalized for improper or non-economical dispatch. There should be enough teeth given to regulations to protect the welfare of the consumers. Otherwise, the SO can violate rules without sanctions, and compliance with the rules will become voluntary.</p>	

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3.1.6 Implementing the Day-Ahead Generation Schedule and issuing of dispatch instructions to generators based on the approved dispatch priority order in a timely manner;	PIPPA	Suggest to revise as follows: Monitoring the compliance of GENs with the Day-Ahead Generation Schedule and the Dispatch Instruction;	Addressed in Section 7.2 Dispatch Instructions of the revised Interim Mindanao Dispatch protocol.
	NGCP in response to PIPPA's comment	NGCP to propose amendment to this provision. Monitoring the compliance of GENs based on the Generation to Maintain matrix. If no re-nomination is submitted by the respective GENs to SO, SO shall then issue re-dispatch instruction through Load Adjustment Notice to adjust (increase/decrease) their output or implement Manual Load Curtailment if the CUS exceeds load allocation with GENs.	
3.1.7 Monitoring the compliance of Generators with the Day-Ahead Generation Schedule and the Dispatch Instruction;	First Gen	Prepare & submit a report to DOE, ERC and the GMC on the compliance monitoring	Section 7.1 (I) Hourly Dispatch Implementation and 7.2 (b) Non-Compliance with the Dispatch Instructions of the revised Interim Mindanao Dispatch Protocol.
	NAPOCOR	Insert" 3.1.11" Establish scheduling & dispatch procedures during market suspension or total black out by using the Merit Order Table (MOT)."	This interim dispatch protocol only applies to current existing excess capacity prior to commercial of operation of WESM in Mindanao.
3.1.8 Conducting economic dispatch with due consideration of the bilateral contracts		No comments received.	
	PIPPA	Suggest to add provision as follows: Providing to all participating GENs and CUSTOMERS (through a secured website) the resulting Day-Ahead Generation Schedules of GENs and corresponding nominations of CUSTOMERS,	Addressed in Section 3.1 (b) System Operator and Section 6.2 (g) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.

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		the constraints, real-time system status, and resulting actual dispatch of all GENs as soon as possible;	
	SURNECO:	Suggest to add provision as follows: 3.1.8 x x x x real time status, and resulting actual dispatch of all GENs as soon as possible (should include: to inform all GENs that in a current time a particular GEN is on forced outage and that CUSTOMERS are required to renominate and that GENs should accept renomination to cover unserved capacity due to forced outage;	Addressed in Section 7.1 (i) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
3.1.9 Ensuring the demand – supply balance is maintained during normal and/or emergency conditions;		No comments received.	
3.1.10 Ensuring the overall reliability and security of Mindanao Grid;		No comments received.	
	PIPPA	Suggest to add provision as follows: Organizing the monthly reconciliation of data for all GENs, CUSTOMERS and SO; and	Addressed in Section 1.2 Scope and Section 2.8 General Requirements of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	The mandate of NGCP is to dispatch and ensure the security and reliability of the grid. The monthly reconciliation of data is already is already part of the responsibility of the market operator under Section 30 of RA 9136.	

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	PIPPA	<p>Suggest to add provision as follows:</p> <p>Provision of adequate Ancillary Services to take care of small system imbalances or sudden tripping of power sources.</p>	<p>Addressed in Section 3.1 System Operator, Section 6.1 Central Dispatch for Grid without WESM, and Section 6.2 (b) and (c) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.</p>
<p>3.1 The Generators and Trading Groups (GENs) The GENs shall be responsible for:</p>		<p>No comments received.</p>	
<p>3.2.1 Submitting the Week-Ahead and Day-Ahead Dependable Capacity, Contracted Capacity, Nominated Capacity for Energy including the replacement power if applicable, Ancillary Services Nomination for certified AS Providers, and other data for its Scheduled generating Units to the SO;</p>	PIPPA	<p>Suggest to revise as follows:</p> <p>Submitting the Week-Ahead and Day-Ahead Dependable Capacity, Contracted Capacity, Nominated Capacity for Energy including the replacement power if applicable, Ancillary Services Nomination for certified AS Providers, and other data for its Generating Units to the SO;</p>	<p>Addressed in Section 3.3 (a) and (b) The Generating Companies of the revised Interim Mindanao Dispatch Protocol.</p> <p>However, all provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.</p>
	STEAG State Power Inc.	<p>The SPI Coal Plant is currently included in the portfolio of the National Power Corporation ("NPC") with 200MW of the SPI Coal Plant capacity contracted to NPC under a long-term Power Purchase Agreement ("PPA"). Up to 10MW of the capacity of the SPI Coal Plant is further contracted to Therma Marine, Inc. ("TMI") on a non-firm basis. SPI respectfully seeks:</p> <p>(a) confirmation that such contracted capacities shall qualify as bilateral contract quantities with NPC and TMI as counterparties; and</p>	<p>PSALM will be registered as the trading participant since PSALM is the one nominating the SPI capacity and it is also the counterparty for the CSEEs. For power plants with IPPAs, the IPP and IPPAs shall agree on their internal protocol. This will also apply with the 10 MW share of TMI.</p>

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		(b) clarification on the applicable nomination protocol considering that the counterparties under the contracts are also classified as generators and not customers.	
3.2.2 Submitting of re-nomination of capacities to SO at least two hours before implementation and shall not be more than three (3) times during peak period and three (3) times during off-peak period within the day;	PIPPA	Suggest to revise as follows: Submitting re-nomination of capacities to SO at least one hour before implementation;	Addressed in Section 7.1 Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision. There should be limitation in the submission of re-nomination for SO to focus more on the security and reliability of the grid.	
	STEAG State Power Inc.	SPI seeks clarification on the protocol to be adopted in case of unscheduled outage when there is a deviation from nominated capacity in view of the occurrence of the unscheduled outage and the Generator can no longer submit any re-nomination of capacity within the period provided.	Addressed in Section 7.1 (i) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	First Gen	This can be revised to 4 re-nominations as the Customers are allowed 4 re-nominations.	Addressed in Section 7.1 Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
3.2.3 Assuring that its generating units can fully deliver the declared dependable and	PIPPA	Suggest to revise as follows: Confirming that its Generating Units can fully deliver the declared Dependable and Contracted	Addressed in Section 3.3 (a) The Generating Companies of the revised Interim Mindanao Dispatch Protocol.

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contracted capacities;		Capacities;	
	NGCP in response to PIPPA's comment	Retain NGCP's original provision.	
3.2.4 Preparing and disseminating the load allocation to their corresponding contracted customers;	PIPPA	Suggest to revise as follows: Preparing and disseminating the load allocation to their corresponding contracted CUSTOMERS;	Adopted the term CUSTOMERs for Load End Customers.
3.2.5 Dispatching of their facilities according to the approved Day-Ahead Generation Schedule generated by the SO;	PIPPA	Suggest to revise as follows: Dispatching of their capacities according to the approved Day- Ahead Generation Schedule generated by the SO or re-nomination of CUSTOMERS;	Addressed in Section 6.3 Generation Day-Ahead Scheduling Procedure The Generating Companies and Section 7.1 Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	NGCP to propose Dispatching of GENs based on the Generation to Maintain matrix and subject for the re-dispatch if re-nomination is submitted or if LAN is issued by the SO.	
3.2.6 Executing instructions of the SO during normal and/or emergency conditions;	NGCP	NGCP to propose executing instructions of the SO during normal and/or emergency to ensure security and reliability of the grid with due consideration to power quality	Original provision retained in Section 3.3 (d) The Generating Companies of the revised Interim Mindanao Dispatch Protocol.
3.2.7 Coordinating at all-times with the SO in maintaining the security and reliability of the grid;		No comments received.	
3.2.8 Providing the 3- Year Maintenance Plan of each generating units to SO;	SURNECO:	Suggest to revise as follows: To include that GENS to provide maintenance schedule of generating units to SO <i>and copy furnish the contracted DUs.</i>	Provision deleted.

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	First Gen	Updates on the maintenance plan shall be given yearly as necessary	
3.2.9 Submitting other information and data that may be required by the SO as stated in the Philippine Grid Code (PGC);		No comments received.	
	PIPPA	Suggest to add provision as follows: Settle imbalances identified in the monthly reconciliation.	Addressed in Section 3.3 (e), (f) and (g) The Generating Companies of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	This is not the mandate of SO since settlement of energy the responsibility of GENCO and Customer or already part of the Market Operator's responsibility under the WESM.	
	SURNECO:	Suggest to add provision as follows: 3.2.9 To provide replacement power in case its own generating unit is on emergency shutdown that it cannot provide the contracted capacity with the customer. Provided that the customer agrees to receive a replacement power. This is due to the case of Customers with unused contracted capacities with other GENs.	Addressed in Section 7.1 (i) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
<p>3.3 The Customers (CUS) The CUS including the Distribution Utilities, Private Utilities, Industrial Utilities and Directly Connected Customers shall be responsible for:</p>	PIPPA	Suggest to revise as follows: The CUSTOMERS shall be responsible for:	Adopted the term CUSTOMERS for Load End Customers.

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	PIPPA	Suggest to add provision as follows: Optimal and least cost dispatch of its contracted GENS;	Adopted in Section 3.4 (a) The Load End Customers of the revised Interim Mindanao Dispatch Protocol.
3.3.1 Submitting their updated bilateral power supply contracted capacities from their power suppliers;	PIPPA	Suggest to revise as follows: Preparing and submitting to the SO their Day-Ahead Customer Demand Forecast to validate SO's Day-Ahead Demand Forecast prepared pursuant to 3.1.2;	Addressed in Section 3.4 (b) The Load End Customers of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision. For clarity. The customers shall submit their customers forecast demand to their respective bilateral GENS since this will be used as reference of the GENS in nominating their respective generation to maintain schedule to SO.	
	First Gen	How often? every middle of the year and year-end and/or there are updates?	
3.3.2 Submitting and preparing their respective Week-Ahead and Day-Ahead Customer Demand Forecast in an accurate and timely manner to the SO;	PIPPA	Suggest to revise as follows: Submitting and preparing their respective Week-Ahead and Day-Ahead Customer Power System Information Report that include the planned and forced outage of distribution equipment in a timely manner to the SO consistent with this Dispatch Protocol;	Addressed in Section 3.4 (c) The Load End Customers of the revised Interim Mindanao Dispatch Protocol. However, all provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Propose amendment to the original provision. Submitting and preparing their respective Week-Ahead and Day-Ahead Customer Demand Forecast in an accurate and timely manner to their respective GENS;	
3.3.3 Submitting their	First Gen	Kindly include a template for this report	No template.

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<p>respective Week-Ahead and Day-Ahead Customer Power System Information Report that include the planned and forced outage of distribution equipment in a timely manner to the SO;</p>			
	PIPPA	<p>Suggest to add provision as follows:</p> <p>Submitting binding nominations and re-nominations of their load requirement to GENs and SO in a timely and accurate manner at least 1 hour and 15 minutes before the affected interval;</p>	<p>Addressed in Section 3.4 (d) The Load End Customers of the revised Interim Mindanao Dispatch Protocol.</p>
	NGCP in response to PIPPA's comment	<p>For clarity. It would be between the GENs and the CUs to agree on which would be the binding transactions.</p>	
<p>3.3.4 Submitting nominations and re-nominations of their load requirement to GENs in a timely manner, and limit such re-nominations to 4 times a day;</p>	NGCP	<p>Retain this protocol or as agreed between GENs and CUs.</p>	<p>Addressed in Section 3.4 (d) The Load End Customers and Section 7.1 (d) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.</p>
	First Gen	<p>The GENs are only limited to 3 re-nominations.</p>	
	ILIGAN LIGHT AND POWER CORP.	<p>On section 3.3, particularly on 3.3.4 the customer has to limit its re-nomination to four (4) times a day. While, in section 7.1 specifically on 7.1.6 re-nominations shall not be more than three (3) times during peak period and three (3) times during off-peak period within the intra-day. What will be the reference of the peak and off-peak period, will it be for the entire system or will it be unique to each market participant?</p> <p>Clarification:</p>	

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		Customer can re-nominate up to four (4) times a day, and during peak and off-peak period is only up to three (3) times?	
3.3.5 Informing the SO for any line or equipment trippings, outages or other events that would result in, or have resulted to the non-compliance of GENs with its Day-Ahead Generation Dispatch Schedule produced by the SO;	PIPPA	Suggest to revise as follows: Informing the SO for any line or equipment trippings, outages or other events that would result in, or have resulted to, the non-compliance of GENs with its Day-Ahead Generation Dispatch Schedule generated by the SO;	Addressed in Section 3.4 (c) The Load End Customers of the revised Interim Mindanao Dispatch Protocol.
	First Gen	Suggest to revise as follows: Informing the SO for any line or equipment trippings, outages or other events that would result in, or have (resulted to the non-compliance of) affected the GENs in complying with its Day-Ahead Generation Dispatch Schedule produced by the SO;	
3.3.6 Coordinating at all-times the SO in maintaining the security and reliability of the grid;		No comments received.	
3.3.7 Providing other data and information required by the SO and GENs as stated in the PGC;		No comments received.	
	PIPPA	Suggest to add provision as follows: If a CUSTOMER is wholly contracted to only one GEN, then it may agree with its GEN for the latter to assume the CUSTOMER responsibilities in the nomination process; This will also be applicable to CUSTOMER wholly contracted with PSALM/NPC;	Addressed in Section 3.3 The Generating Companies of the revised Interim Mindanao Dispatch Protocol.

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
		The CUSTOMER and the GEN who have made such agreement shall provide the SO with a copy of the said agreement.	
4.0 Dispatch Criteria and Priority Order		No comments received.	
4.1 Dispatch Criteria The System Operator shall undertake the day-ahead load forecasting and dispatch scheduling in a manner that will result to the least cost to users, based on the consideration of the following operational criteria but not limited to:	PIPPA NGCP in response to PIPPA's comment ABOITIZ	Suggest to revise as follows: The SO shall undertake the day-ahead load forecasting and Dispatch Scheduling based on the consideration of the following operational criteria, but not limited to: Propose amendment to the original provision. The SO shall undertake the Day Ahead System Demand Forecasting and shall be used as reference in the preparation of the Day Ahead Generation scheduling in consideration with the Order of Priority Suggest to revise as follows: The System Operator shall undertake the day - ahead load forecasting and dispatch scheduling in a manner that will result to the least cost to users, based on the consideration of the following operational criteria but not limited to: and that nomination and re-nominations are consistent with customers' demand forecast.	Revised in Section 4.1 Dispatch Criteria of the revised Interim Mindanao Dispatch Protocol as follows: <i>The SO shall undertake the Day-Ahead Load Forecasting and Dispatch Scheduling based on, but not limited to the following operational criteria:</i>
4.1.1 The synchronized generating capacity shall be sufficient to match, at all times, the forecasted Grid Demand and the required operating reserve to ensure the Security and Reliability of the Grid;		No comments received.	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
4.1.2 The technical and operational constraints of the Grid and the Generating Units;		No comments received.	
4.1.3 The Government mandated activities during special events;	NGCP	For clarity. This provision if require exemption from interruption of power supply should not introduce any risk in system security.	Noted.
4.1.4 The statutory requirements on Lake Lanao Operations;	First Gen	What are these?	These are the requirements in line with operation of Agus Hydro plants.
	NGCP	For deletion. Should be considered already in the NPC-PSALM nomination	Provision retained in Section 4.1 (d) Dispatch Criteria of the revised Interim Mindanao Dispatch Protocol.
4.1.5 The bilateral supply contracted capacities between generators and distribution utilities;	PIPPA	Suggest to revise as follows: The bilateral supply contracted capacities between GENs and distribution utilities;	Adopted the term GENs for Generators.
4.1.6 The declared nomination and re-nominations of generators and its corresponding bilateral customers;	PIPPA	Suggest to revise as follows: The declared nomination and re- nominations of GENs and its corresponding bilateral CUSTOMERS;	Adopted the term GENs for Generators and CUSTOMERs for Load End Customers.
4.1.7 The load and supply balance of load customers;	PIPPA	Suggest to revise as follows: The load and supply balance of CUSTOMERS;	Adopted the term CUSTOMERs for Load End Customers.
	NGCP in response to PIPPA's comment	For clarity. This is only being done during the In-day dispatch	Noted.
4.1.8 The Security and Reliability of the Grid.		No comments received.	
4.2 Dispatch Order of Priority	DMC	Section 4.2 Dispatch Order of Priority of Annex A "Mindanao Dispatch Protocol" clearly established dispatching based on the type of technology. This	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
		<p>generally indicates that Renewable Energy plants/units with capacity nomination are to first to be dispatched; while Diesel plants having the higher operating costs are last to be dispatched. Subsection 6.3.2 Excess Generation also provides that shutting down of plants may be implemented when the minimum stable load (Pmin) of all generators is greater than the load forecasted demand.</p> <p>Based on these provisions, the DMC would like to clarify the order on how each plant within the same technology shall be treated in the dispatch order of priority.</p> <p>The DMC recommends including in the protocol that each generator shall provide to the System Operator its approved PSA rated for proper determination of dispatch sequence within each type of technology.</p>	
	ABOITIZ	<p>We propose that the dispatch protocol should not only consider, but prioritize contracted capacities of generators, instead of what SO deemed as "least cost manner".</p> <p>We note that NPC plants are prioritized over merchant generators, even if both are contracted and even if the NPC plant is coal.</p>	
	Alsons Power	<p>Perhaps what should only be prioritized are the Pmin of plants (except for fast start plants) and intermittent RE, as per RE law. All others should already be on an "as per nominated/re-nominated" basis.</p> <p>What assurance do the industry participants, especially the consumers and gencos that NGCP is conducting a fair dispatch? Whether it is NGCP or,</p>	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
		(preferably) an independent entity that manages the dispatch, the rules governing this function will have to be spelled out and agreed upon by the affected parties. Only then can all the players be assured of fairness in the dispatch rules. As to the implementation of the dispatch rules, NGCP or the entity that will manage the dispatch have to be liable for their failure to comply with the agreed rules.	
	CEPALCO	Will this include Embedded Generators?	Embedded plants are not included in the dispatch priority order.
	PIPPA	Suggest to add provision as follows: Any deviation in demand or supply from day-ahead nominations shall be re-nominated by the customer to the corresponding generator and SO. The generator shall also correspondingly re-nominate its planned dispatch to SO.	Addressed in Section 3.4 (d) The Load End Customers and Section 7.1 Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Re-nomination of customer to be submitted to generator only	
	PIPPA	Suggest to add provision as follows: On real time, if the SO will have to deviate from the schedules resulting from nominations and re-nominations due to system optimization (i.e., intermittent GENs dispatch variations), then it shall inform the GENs immediately. The GENs will inform its CUSTOMERS of said event. The CUSTOMERS shall then re-nominate corresponding revised quantities to the GENs and SO. This shall ensure that any imbalance is properly accounted for by the customer and generator participants.	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
	NGCP in response to PIPPA's comment	<p>On real-time, in case there is imbalance between nomination and actual demand because of failure of Generators to re-nominate, SO shall issue Load Adjustment Notice (LAN) to Generators to adjust (increase/decrease) the output to ensure a balanced demand and supply.</p> <p>On the other hand, if DUs/ECs failed to re-nominate to Generators and exceeds the load allocation, SO may implement Manual Load Curtailment.</p>	
	PIPPA	<p>Suggest to add provision as follows:</p> <p>NPC/PSALM shall adjust dispatch of their non-intermittent GENS to cover for the dispatch adjustment of their intermittent GENS and be consistent with their Generation Schedules;</p>	
	NGCP in response to PIPPA's comment	For clarification with PIPPA	
	PIPPA	<p>Suggest to add provision as follows:</p> <p>If no re-nomination was submitted by the CUSTOMER to the SO and contracted GEN, then the Day-Ahead nomination of the Customer shall be binding and shall be deemed delivered by the Generator to the Customer.</p>	
	NGCP in response to PIPPA's comment	<p>For clarity. The non-submission re-nomination of CUS to GENS and GENS to SO during the In-day dispatch would mean the DAY Ahead Generation schedule based on the Generation to Maintain matrix shall prevail. The proposal of PIPPA requires agreement between GENS and CUS as the case</p>	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
		maybe.	
	PIPPA	Suggest to add provision as follows: Any generator imbalances shall be settled from the monthly reconciliation process identified herein;	
	NGCP in response to PIPPA's comment	The settlement of imbalances as a result of the monthly reconciliation should be handled by a certain group which is capable to do the settlement. NGCP is not equipped as of now to handle any reconciliation between the GENS and the CUS. This is already commercial issues and not for NGCP's mandate.	
4.2.1 The Dispatch Order of Priority shall be established per type of technology and based on the lowest to highest operational cost ranking, with due consideration of Government Mandated Law:	PIPPA	Suggest to revise as follows: The Dispatch Order of Priority shall be as follows:	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	NCGP proposal. If the Order-of Priority of SO is not acceptable to PIPPA, NGCP recommends that the GENS and CUS shall divulge their contract price so that the ranking in the order –of priority can be easily ranked from lowest to highest.	
	PIPPA	Suggest to add provision as follows: Minimum stable load of all the generation units, exceptGENs with fast start capabilities and intermittent REs	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
4.2.1.1 Renewable energy plants/units with capacity nomination shall be priority dispatch per RE Law for Small Hydros, Solar, Biomass and Wind.	PIPPA	Suggest to revise as follows: Renewable energy plants/units with capacity nomination shall be priority dispatch per RE Law for Small Hydros, Run- of-River Hydros, Solar, Biomass and Wind.	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
	First Gen	What is the capacity of the Small Hydros, Solar,	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
		Biomass, Wind?	
4.2.1.2 National Power Corporation (NPC) Hydro Plants are 2nd to dispatch since they are the least cost among other Generating Units in the Mindanao.	PIPPA	Suggest to revise as follows: 4.2.7.3 GENs used for Regulating Reserves/ Voltage Regulation by SO or CUSTOMERS	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Ancillary reserves should not be part of the merit order Table	
4.2.1.3 NPC Coal specifically STEAG Power Coal Plant is 3rd to dispatch since it is currently under the NPC portfolio and the least cost among other coal-fired power plants.	PIPPA	Suggest to revise as follows: Base load plants depending on their contracted capacities	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	For clarification of Based load plants.	
	STEAG State Power Inc.	The SPI Coal Plant has been identified as third in the Dispatch Order of Priority under the proposed Mindanao Dispatch Protocol annexed to the Draft DC. SPI respectfully seeks clarification on the application of the Dispatch Order of Priority in respect of the capacity in excess of the 200MW contracted to NPC.	
4.2.1.4 Geothermal is 4th to dispatch. A based load plant, renewable and with operational and environmental constraints.	ILIGAN LIGHT AND POWER CORP.	In the Dispatch Order Priority, does the Geothermal Power Plants that are not in the portfolio of PSALM included in this dispatch priority?	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
4.2.1.5 Independent Power Producers (IPP) Coal Generators are the 5th to		No comments received.	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
dispatch. These are the new base load plants in the region with corresponding Bilateral Contracts with the Customers.			
4.2.1.6 Diesel Generators are the last to dispatch considering the operational cost per kWh. These include the IPPs, Small Diesel Plants and Modular Plants.	PIPPA	Suggest to revise as follows: Diesel GENs, including the IPPs, Small Diesel Plants and Modular Plants, depending of their contracted capacities	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
	PIPPA	Suggest to add provision as follows: Uncontracted GENs, upon emergency conditions	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
4.2.2 The SO shall follow the Dispatch Order of Priority from the lowest operational cost GENs to the highest for the increase of generation to Pmax, and from highest operational cost GENs to lowest for decrease of generation to shutdown.	ABOITIZ	The SO may not know the highest to lowest operational costs of generators. However, the customers would know based on their nominated/re-nominated contracted capacities. 4.2.2 The SO shall follow the Dispatch Order of Priority based on nomination/re-nomination of contracted quantities from the lowest operational cost GENs to the highest for the increase of generation to Pmax, and from highest operational cost GENs to lowest for decrease of generation to shut down.	Addressed in Section 4.2 Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
5.0 Generation to Maintain Matrix		No comments received.	
5.1.1 The Generation to Maintain Matrix Table (GMMT) contains the Day-Ahead Generation Schedule per Generator arranged	PIPPA	Suggest to revise as follows: The Generation to Maintain Matrix Table (GMMT) contains the Day-Ahead Generation Schedule per GEN arranged based on the Priority Dispatch Order	Addressed in Section 5.1 Generation to Maintain Matrix Table of the revised Interim Mindanao Dispatch Protocol.

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
based on the Priority Dispatch Order with their corresponding bilateral customers. (see Attachment 9 for sample illustration of Generation to Maintain Matrix Table);		as per Section 4.2.6 with their corresponding bilateral CUSTOMERS. (see Attachment 9 for sample illustration of Generation to Maintain Matrix Table);	
5.1.2 The GMMT is formulated in an hourly basis and shall be used in the In-Day Dispatch Implementation by SO.	NGCP	For clarity. The GMMT shall be used by the System Operator during the In-day dispatch implementation and shall serve as a guide for re-nomination of GENs to SO and issuance of LAN and implementation of manual load curtailment.	Addressed in Section 3.3 (c) The Generating Companies and Section 5.2 Generation to Maintain Matrix Table of the revised Interim Mindanao Dispatch Protocol.
	PIPPA	Suggest to add provision as follows: Any revision from the dispatch schedule shall be recorded by SO to be re-nominated by the CUSTOMERS to the GENs, and the GENs to SO.	Adopted in Section 5.3 Generation to Maintain Matrix Table of the revised Interim Mindanao Dispatch Protocol.
6.0 Dispatch Scheduling		No comments received.	
Dispatch is the process of apportioning the total Demand of the Grid through the issuance of Dispatch Instructions to the Scheduled Generating Units and the Generating Units providing Ancillary Services in order to achieve the operational requirements of balancing Demand with Generation that will ensure the Security of the Grid.	PIPPA	Suggest to revise as follows: Dispatch is the process of apportioning the total Demand of the Grid through the issuance of Dispatch Instructions to the GENs, including those providing Ancillary Services in order to achieve the operational requirements of balancing Demand with Generation that will ensure the Security of the Grid.	Adopted the term GENs for Generators.
6.1 Central Dispatch for Grid Without WESM		No comments received.	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
Central Dispatch is the process of scheduling generation facilities and issuing dispatch instructions to industry participants, (considering the energy demand, operating reserve requirements, security constraints, outages and other contingency plans,) to achieve economic operation while maintaining Power Quality, Reliability and Security of the Grid.		No comments received.	
The System Operator shall be guided by the dispatch criteria as stated in Section 4.0 and shall ensure the reliability and security of the Grid in all aspects of scheduling and dispatching consistent with the provisions of PGC.	PIPPA	Suggest to revise as follows: The SO shall be guided by the dispatch criteria as stated in Section 4.0 and shall ensure the reliability and security of the Grid in all aspects of scheduling and dispatching consistent with the provisions of PGC.	Adopted the term SO for System Operator.
6.2 Timetable		No comments received.	
The nomination and dispatch protocol timetable provides an overall schedule of activities under different time frames of operation. These activities are presented as follows:		No comments received.	
6.2.1 Week-Ahead Scheduling		No comments received.	
6.2.1.1 The SO shall generate the Week-Ahead		No comments received.	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
System Generation Requirement (WASGR) by evaluating the Week-Ahead Load Requirement (WALR) using the SO's Generation Load Forecasting Tool.			
6.2.1.2 The SO shall then determine the Ancillary Service requirement and transmit to NPC-PSALM by 0900H the Week-Ahead Ancillary Services Requirement (WAASR) (see Attachment 1 for WAASR template).	First Gen	on what day this will be transmitted?	All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.
6.2.1.3 NPC-PSALM to submit to SO their Ancillary Nomination and Dependable Capacity on or before 1000H.	First Gen	Same day as above?	All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.
6.2.1.4 CUs shall submit by 1000H of Thursday of the current week the Week-Ahead Load Nomination (WALN) (see Attachment 2 for WALN template) to NPC-PSALM and other GENs they have Bilateral Contracts with.	PIPPA	Suggest to revise as follows: CUSTOMERS shall submit by 1000H of Thursday of the current week the Week-Ahead Load Nomination (WALN) (see Attachment 2 for WALN template) to NPC-PSALM and other GENs they have Bilateral Contracts with.	All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.
6.2.1.5 All GENs shall submit to SO on or before 1400H of Thursday of the current week the Week Ahead Dependable Capacity			All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
(WADC) (see Attachment 3 for WADC template) and the Week-Ahead Contracted Capacity (WACC) (see Attachment 4 for WACC template).			
6.2.1.6 The SO shall evaluate on or before 1400H of Thursday of the current week all the submitted Dependable and Contracted Capacities.	First Gen	Is there still time to evaluate and review the evaluation since the GENs deadline of submission is also 1400H. The evaluation should be documented, recorded and kept.	All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.
6.2.1.7 The SO shall submit the Weekly Power Outlook (see Attachment 5 for WPO template) in consideration of the CUs WALN and GENs WADC on or before 1400H every Thursday of the current week, and shall be updated daily.	PIPPA	Suggest to revise as follows: The SO shall submit the Weekly Power Outlook (see Attachment 5 for WPO template) in consideration of the CUSTOMERS WALN and GENs WADC on or before 1400H every Thursday of the current week, and shall be updated daily.	All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.
	First Gen	Same comment above. The timetable needs adjustment. CUs and other WESM Mindanao participants should be given copies.	All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.
6.2.1.8 SO shall submit by 1700H of Thursday of the current week the Week-Ahead Generation Schedule (WAGS) using all the available data submitted.			All provisions in relation to Week-Ahead procedures were deleted in the revised Interim Mindanao Dispatch Protocol.
6.2.2 Day-Ahead Scheduling		No comments received.	
6.2.2.1 The SO shall generate the Day-Ahead		No comments received.	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
System Generation Requirement (DASGR) by evaluating the Day-Ahead Load Requirement (DALR) using the SO's Generation Load Forecasting Tool.			
6.2.2.2 The SO shall then determine the Ancillary Service requirement and transmit to NPC-PSALM by 0900H the Day-Ahead Ancillary Services Requirement (DAASR)	PIPPA	Suggest to revise as follows: The SO shall then determine the Ancillary Service requirement and transmit to NPC-PSALM by 0900H of the current day the Day-Ahead Ancillary Services Requirement (DAASR)	Adopted in 6.2 (b) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
6.2.2.3 NPC-PSALM to submit to SO their Day-Ahead Ancillary Nomination and Dependable Capacity on or before 1000H.	PIPPA	Suggest to revise as follows: NPC-PSALM to submit to SO their Day-Ahead Ancillary Nomination and Dependable Capacity on or before 1000H of the current day.	Adopted in Section 6.2 (c) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
	ILIGAN LIGHT AND POWER CORP.	In the Day-Ahead Scheduling, the NPC-PSALM will submit to the SO its Dependable Capacity on or before 1000H, however the DU are to submit their Day-Ahead Load Nomination on the same time. Won't this time interval too short for a DU to prepare its DALN, say for example PSALM will submit close to 1000H? Suggestion: Extend the time of the DUs to prepare its DALN considering the time the PSALM submitted its Dependable Capacity	Addressed in Section 6.2 Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
6.2.2.4 SO to generate Day-Ahead Ancillary Reserve Schedule (DAARS) and shall	PIPPA	Suggest to revise as follows: SO to generate Day-Ahead Ancillary Reserve	Addressed in Section 6.2 Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
be submitted to Ancillary Reserve Service Providers on or before 1600H. The DAARS shall serve as the reference for billing settlement.		Schedule (DAARS) and shall be submitted to Ancillary Reserve Service Providers on or before 1600H of the current day. The DAARS shall serve as the reference for billing settlement.	Protocol.
6.2.2.5 CUs shall submit by 1000H of the current day for the Day-Ahead Load Nomination (DALN) (See Attachment 6 for DALN template) to NPC-PSALM and other GENs they have Bilateral Contracts with.	PIPPA	Suggest to revise as follows: SO to provide each CUSTOMERS their Day-Ahead demand forecast using the SO's Generation Load Forecasting Tool before 0900H of the current day.	Addressed in Section 6.2 (d) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
	PIPPA	Suggest to add provision as follows: CUSTOMERS shall validate SO's Day-ahead demand forecast and prepare their Day-Ahead Load Nomination (DALN) Form	Addressed in Section 6.2 (d) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
	PIPPA	Suggest to add provision as follows: CUSTOMERS shall submit by 1000H of the current day their validated Day-Ahead Load Nomination (DALN) (See Attachment 6 for DALN template) to NPC-PSALM, the GENs they have Bilateral Contracts with, and SO.	Addressed in Section 6.2 (d) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
6.2.2.6 All GENs shall submit to SO on or before 1400H of the current day the Day Ahead Dependable Capacity (DADC) (see Attachment 7 for DADC template) and the Day-Ahead Contracted Capacity (DACC)	PIPPA	Suggest to revise as follows: All GENs shall submit to SO on or before 1400H of the current day the Day Ahead Dependable Capacity (DADC) (see Attachment 7 for DADC template) and the Day-Ahead Contracted Capacity (DACC) (see Attachment 8 for DACC template).	Addressed in Section 6.2 (e) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
(see Attachment 8 for DACC template).			
6.2.2.7 The SO shall evaluate on or before 1400H of the current day all the submitted Day-Ahead Dependable and Contracted Capacities.	PIPPA	Suggest to revise as follows: The SO shall evaluate on or before 1400H of the current day all the submitted Day-Ahead Dependable and Contracted Capacities.	Addressed in Section 6.2 (f) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
	First Gen	Is there still time to evaluate and review the evaluation since the GENs deadline of submission is also 1400H	Addressed in Section 6.2 (g) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
6.2.2.8 The SO shall submit the Daily Power Outlook in consideration of the GENs DADC and Load Forecasted Demand on or before 1200H of the current day.	First Gen	Same comment for 6.2.2.7. Timetable needs adjustment. Consideration should also include the CUs DALN. The CUs WALN is being considered in the Weekly Power Outlook (6.2.1.7)	Provision was deleted.
6.2.2.9 SO shall submit by 1600H of the current day the Day-Ahead Generation Schedule (DAGS) using all the available data submitted.	CEPALCO	These data should be published so that DU will also know how much is the scheduled quantity of the GEN with whom it has bilateral contract with.	Addressed in Section 3.1 (b) System Operator and Section 6.2 (g) Day-Ahead Scheduling Process of the revised Interim Mindanao Dispatch Protocol.
6.3 Generation Day-Ahead Scheduling Procedure		No comments received.	
SO shall generate the Day-Ahead Generation Schedule (DAGS) of GENs in accordance to Section 4.0 and the scheduling timetable.	PIPPA	Suggest to revise as follows: SO shall generate the Day-Ahead Generation Schedule (DAGS) of GENs in accordance with Section 4.0 and the Day-Ahead Scheduling timetable under Section 6.2.2.	Addressed in Section 6.3 Generation Day-Ahead Scheduling Procedure of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to	Check section 4 and section 6.2.2 for consistency	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
	PIPPA's comment		
6.3.1 Normal Condition		No comments received.	
6.3.1.1 During normal conditions, the SO shall determine the Day-Ahead Generation Schedule of GENs for each interval based on the submitted dependable capacity nomination against the demand forecast.	PIPPA	Suggest to revise as follows: During normal conditions, the SO shall determine the Day-Ahead Generation Schedule of GENs for each interval based on the submitted dependable capacity nomination and DALN.	Addressed in Section 6.3.1 (a) Normal Condition of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision	
6.3.1.2 The Day-Ahead Generation Scheduling shall be based in accordance to Section 4.2 Dispatch Order of Priority	PIPPA	Suggest to revise as follows: The Day-Ahead Generation Scheduling shall be based in accordance to Section 4.2.	Addressed in Section 6.3.1 (b) Normal Condition of the revised Interim Mindanao Dispatch Protocol.
6.3.2 Excess Generation	First Gen	Specify/spell out first what Pmin is, which is "Minimum Stable Loading" (Pmin) before using Pmin as a term	Addressed in Section 8.0 Definition of Terms of the revised Interim Mindanao Dispatch Protocol.
6.3.2.1 Determine the total capacity of online Pmin against load forecasted demand.		No comments received.	
6.3.2.2 Excess Generation exist if the total capacity of online Pmin is greater than the load forecasted demand.		No comments received.	
6.3.2.3 Identify intervals		No comments received.	

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
where excess generation capacity exists.			
6.3.2.4 Effect shutdown of identified online Pmin in accordance to the emergency procedure for Excess Generation of System Operator and as stated in Section 7.1.10	PIPPA	Suggest to revise as follows: Effect shutdown of identified online Pmin in accordance to the emergency procedure for Excess Generation of SO and as stated in Section 7.1.10	Adopted the term SO for System Operator.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision.	
	MINERGY	Section 6.3.2.4 of the Mindanao Dispatch Protocol provides for the System Operator Emergency Procedure for Excess Generation but there are no written details in the protocol covering such procedure. Suggestion: We suggest that the Mindanao Dispatch Protocol adopt the applicable provisions of the existing WESM Management Procedure of Excess Generation (Issue 2.0); e.g., Section 6.2 Real Time Dispatch With Excess Generation Intervals, among others.	Addressed in Section 6.3.2 Excess Generation of the revised Interim Mindanao Dispatch Protocol.
	CEPALCO	How about GENs with bilateral supply commitments with the DU? Will they be included in the load adjustment?	Addressed in Section 4.2 (c) Dispatch Order of Priority of the revised Interim Mindanao Dispatch Protocol.
	First Gen	Suggest to add revision as follows: 6.3.3 Generation Deficit - provide also guidelines when this happens 6.3.4 Emergency Condition - provide also guidelines	Addressed in Section 7.1(i) and (j) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
		when this happens	
	PIPPA	<p>Suggest to add provision as follows:</p> <p>The shutdown of identified GEN to address Excess Generation shall not be a forced outage of the said GEN. The CUSTOMERS contracted by the GEN on shutdown, due to Excess Generation, shall continue with the bilateral contract as if the GEN is still dispatching.</p>	Addressed in Section 6.3.2 (b) Excess Generation of the revised Interim Mindanao Dispatch Protocol.
7.0 In-Day or Real Time Dispatch		No comments received.	
7.1 Hourly Dispatch Implementation		No comments received.	
7.1.1 The DAGS shall be used by SO during the In-Day Hourly Dispatch Implementation.		No comments received.	
7.1.2 The SO shall issue Dispatch Instructions to all GENs to ensure timely and accurate hourly dispatch implementation of the DAGS.		No comments received.	
7.1.3 The GENs shall follow dispatch instructions issued by System Operator during Normal and Emergency conditions.	PIPPA	<p>Suggest to revise as follows:</p> <p>The GENs shall follow dispatch instructions issued by the SO during normal and emergency conditions.</p>	Adopted the term SO for System Operator.
	First Gen	Provide guidelines for Emergency conditions	Addressed in Section 7.1 (j) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
7.1.4 The customers shall notify their BPS GENs if there is a need for load adjustment	PIPPA	<p>Suggest to revise as follows:</p> <p>The CUSTOMERS shall notify their contracted</p>	Addressed in Section 7.1 (d) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch

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at least two hours before the implementation.		GENs their re-nominations at least one hour and 15 mins before the implementation.	Protocol.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision.	
	First Gen	Spell out first BPS before using this acronym	
7.1.5 The GENs shall submit re-nominations to System Operator as a result of Load Adjustment of customers.	PIPPA	Suggest to revise as follows: The GENs shall submit re-nominations to SO.	Addressed in Section 7.1 (e) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
7.1.6 The allowable submission of re-nominations shall not be more than three (3) times during peak period and three (3) times during off-peak period within the intra-day.	PIPPA	Suggest to revise as follows: The final nomination or re-nomination shall be binding to the customer and the generator.	Addressed in Section 7.1 (f) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision.	
	First Gen	Customers are allowed 4 re-nominations. Kindly consider revision.	
7.1.7 Load Adjustment Notice (LAN) shall be issued by System Operator to the BPS GENs if there are an excess BPS generation as a result of none submission re-nominations.	ABOITIZ	If re-nominations are already binding, then there is no need for LAN. Propose to delete this provision.	Addressed in Section 7.1 (g) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	PIPPA	Suggest to add provision as follows: If SO will have to deviate from the schedules resulting from nominations and re-nominations due to system optimization (ie intermittent REs), then it	Addressed in Section 7.1 Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.

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		shall inform the GENs immediately. The GENs will inform its CUSTOMERS of said event. The customer shall then re-nominate corresponding revised quantities to the GENs and SO. This shall assure that any imbalance is properly accounted for by the customer and generator participants.	
	PIPPA	Suggest to add provision as follows: If no re-nomination was submitted by the Customer to SO and contracted Generator, then the Day-Ahead nomination of the Customer shall be binding and shall be deemed delivered by the Generator to the Customer.	Addressed in Section 7.1 (g) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	PIPPA	Suggest to add provision as follows: Any imbalance shall be identified and settled in the monthly reconciliation	Addressed in Section 7.1 (g) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
7.1.8 In case of excess generation where the total online Pmin is greater than the actual system demand during the intra-day dispatch implementation, the System Operator shall issue re-dispatch instruction in accordance to Section 6.3.2.4	PIPPA	Suggest to revise as follows: In case of excess generation where the total online Pmin is greater than the actual system demand during the intra-day dispatch implementation, the SO shall issue re-dispatch instruction in accordance to Section 6.3.2.	Addressed in Section 7.1 (h) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Check section 6.3.2.4 for consistency	
7.1.9 During tripping or deration of generating units, GENs shall submit re-nomination to the System Operator. The bilateral	PIPPA	Suggest to revise as follows: During tripping or deration of generating units, GENs shall submit re-nomination to the SO. The bilateral affected CUSTOMERS shall look for another	Addressed in Section 7.1 (i) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.

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affected customers shall look for another replacement BPS GENs. Otherwise, System Operator shall implement Manual Load Curtailment to maintain security and reliability of the grid with due consideration to power quality.		replacement contracted GENs. Otherwise, System Operator shall implement Manual Load Curtailment to maintain security and reliability of the grid with due consideration to power quality.	
	NGCP in response to PIPPA's comment	Retain NGCP's original provision	
	First Gen	Unless in the PSA of the CUs and GENs, there is a replacement power provision or depending on the agreement of both parties. Load curtailment notice shall be given	
7.1.10 The SO shall deviate from the Dispatch Order of Priority, when there's an impending threat in system security and shall immediately issue emergency dispatch instruction to the identified Generators to immediately address the situations/conditions.	PIPPA	Suggest to revise as follows: The SO shall deviate from the Dispatch Order of Priority, when there's an impending threat in system security and shall immediately issue emergency dispatch instruction to the identified GENs to immediately address the situations/conditions.	Addressed in Section 7.1 (j) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision	
	First Gen	This shall be properly recorded and documented and reported to DOE, ERC, WESM & WESM participants	Addressed in Section 7.2 (a) Compliance with the Dispatch Instructions of the revised Interim Mindanao Dispatch Protocol.
	ABOITIZ	Would like to kindly propose that a report or message be sent by SO to the generators after the event has transpired within 7 days.	
	Alsons Power and DASURECO	There is no definition on what constitutes impending threat. This is another reason why the dispatch rules will have to be well-defined and agreed upon by all the players in the WESM.	
7.1.11 GENS and CUS	PIPPA	Suggest to revise as follows:	Addressed in Section 7.1 (k) Hourly

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
connected to the grid shall acknowledge and comply at all times the dispatch instructions issued by the SO.		GENs and CUSTOMERS connected to the grid shall acknowledge and comply at all times the dispatch instructions issued by the SO.	Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision	
7.1.12 The SO shall thoroughly monitor the Grid to ensure compliance of the Dispatch Instructions by all connected users. All non-compliance with the Dispatch Instructions shall be reported by the SO to ERC.	PIPPA	Suggest to revise as follows: The SO shall thoroughly monitor the Grid to ensure compliance of the Dispatch Instructions by all connected users. All non-compliance with the Dispatch Instructions shall be reported by the SO to ERC.	Addressed in Section 7.1 (l) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	Retain NGCP's original provision	
	First Gen	Copy furnished DOE, NEA.	
	PIPPA	Suggest to add provision as follows: Actual schedules and dispatch shall be published for all participating CUSTOMERS and GENs.	Adopted in Section 7.1 (m) Hourly Dispatch Implementation of the revised Interim Mindanao Dispatch Protocol.
7.2 Dispatch Instructions		No comments received.	
7.2.1 Compliance with the Dispatch Instructions		No comments received.	
7.2.1.1 During the hourly Dispatch Implementation, GENs from shutdown state shall communicate and seek clearance from the SO at		No comments received.	

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<p>least one (1) hour before the target synchronization/loading. The System Operator has the discretion not to allow synchronization if the system security is at risk.</p>			
<p>7.2.1.2 Likewise, GENs shall communicate and seek clearance from the SO at least one (1) hour before the shutdown of generating units.</p>	PIPPA	<p>Suggest to revise as follows:</p> <p>Likewise, GENs shall communicate and seek clearance from the SO at least one (1) hour before any shutdown of generating units, except during emergency shutdowns.</p>	<p>Adopted in Section 7.2 (a) Compliance with the Dispatch Instructions of the revised Interim Mindanao Dispatch Protocol.</p>
<p>7.2.1.3 All Dispatch Instructions issued by the SO to all Grid Users shall be recorded through the dispatcher's log and voice recording facilities for audit and investigation purposes.</p>	PIPPA	<p>Suggest to revise as follows:</p> <p>All Dispatch Instructions issued by the SO to all Grid Users shall be recorded through the dispatcher's log and voice recording facilities for audit and investigation purposes. Likewise, all GENs may also record through their own facilities.</p>	<p>Adopted in Section 7.2 (a) Compliance with the Dispatch Instructions of the revised Interim Mindanao Dispatch Protocol.</p>
<p>7.2.2 Non-Compliance with the Dispatch Instructions</p>			
<p>7.2.2.1 The Generator/s failed to follow the Dispatch Instructions from the System Operator during the emergency condition where there is a threat in the security and reliability of the grid, the System Operator shall report immediately in writing to ERC, citing non-compliance to the dispatch</p>	First Gen	<p>Copy furnished DOE. What about during normal conditions wherein the GENs delivered above or below their nominations?</p>	<p>Addressed in Section 7.2 (b) Compliance with the Dispatch Instructions of the revised Interim Mindanao Dispatch Protocol.</p>

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
instruction.			
7.2.2.2 In cases that the compliance of Dispatch Instructions is disputed, both the SO and Grid Users shall document their communication, agreements, disagreements and reasons for their actions, to enable the settlement of the dispute thru ERC.	PIPPA	Suggest to revise as follows: In cases that the compliance of Dispatch Instructions is disputed, both the SO and GEN shall document their communication, agreements, disagreements and reasons for their actions, to enable the settlement of the dispute thru ERC.	Adopted in Section 7.2 (b) Non-Compliance with the Dispatch Instructions of the revised Interim Mindanao Dispatch Protocol.
The SO shall maintain all records of Dispatch Instruction whether in electronic copy, fax and recorded verbal communications related to Dispatch Instructions. These records can be used for audit or investigations by ERC and/or other government agencies.	PIPPA	Suggest to revise as follows: The SO shall maintain all records of Dispatch Instruction whether in electronic copy, fax and/or recorded verbal communications related to Dispatch Instructions. These records shall be used in the monthly reconciliation of all participants.	Adopted in Section 7.2 (b) Non-Compliance with the Dispatch Instructions of the revised Interim Mindanao Dispatch Protocol.
	PIPPA	Suggest to add provision as follows: Monthly Reconciliation	Addressed in Section 1.2 Scope and Section 2.8 General Requirements of the revised Interim Mindanao Dispatch Protocol.
	PIPPA	Suggest to add provision as follows: Every ___ of the month, identified representatives of each GENs, CUSTOMERS and SO shall meet to reconcile all the data for the billing month which just ended. Data includes (but not limited to) Metered Quantities, nominations and re-nominations, actual	Addressed in Section 1.2 Scope and Section 2.8 General Requirements of the revised Interim Mindanao Dispatch Protocol.

NGCP's Original Dispatch Protocol	Proponent	Comments	Response
		dispatch of SO, dispatch deviations, forecast deviations and system losses;	
	NGCP in response to PIPPA's comment	This is not the mandate of SO since settlement of energy the responsibility of GENCO and Customer or already part of the Market Operator's responsibility under the WESM..	
	PIPPA	Suggest to add provision as follows: The monthly reconciliation shall also include the settlement of the imbalances, such that the imbalance price shall be an agreed price by all GENs ; and	Addressed in Section 1.2 Scope and Section 2.8 General Requirements of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	This is not the mandate of SO since settlement of energy the responsibility of GENCO and Customer or already part of the Market Operator's responsibility under the WESM.	
	PIPPA	Suggest to add provision as follows: The imbalances shall be billed by NGCP, as permitted under the OATS and ASCRM.	Addressed in Section 1.2 Scope and Section 2.8 General Requirements of the revised Interim Mindanao Dispatch Protocol.
	NGCP in response to PIPPA's comment	This is not the mandate of SO since settlement of energy the responsibility of GENCO and Customer or already part of the Market Operator's responsibility under the WESM. Further, the Energy Imbalance under the ASCRM pertains to the energy supplied by AS providers. With the operation of the IMEM, this charge is no longer applicable.	
Definition of Terms	First Gen	Place after Section 1 in consistency with the EPIRA and PGC structure and for convenience. We will know at the start the meaning of terms.	Noted.