



Republic of the Philippines
**ENERGY
REGULATORY
COMMISSION**

Document	Article / Section	Discussion of Comment/s and/or Questions for Clarification	Suggestions / Proposed Change/s
Annex A Rules for Setting Distribution Wheeling Rates (RDWR)	General Comment		<ul style="list-style-type: none">• PEPOA would like to reiterate its position on decoupling the rules and processes in reference to the Fifth Regulatory Period and those for the Third (<i>covering the Second, Third & Fourth Entry Groups</i>) & Fourth Regulatory Periods. We recommend that the Honorable Commission conduct focus group discussions for said matter involving various industry stakeholders.• With regards posting requirements on notices for various reset activities, PEPOA proposes that the Honorable Commission introduce measures that will encourage better customer reach and participation. Making it mandatory for DUs to conduct extensive information drive on pubcons is a good direction.

<p>Annex B Issues Paper for the Regulatory Reset for the First Entry Group for the Fourth and Fifth Regulatory Period</p>	<p>Section 3.2 Reset Timetable;</p> <p>Section 5.1 Regulatory Asset Base (RAB)</p>		<ul style="list-style-type: none"> • PEPOA proposes that the reset process and timetable schedules complete the Opening RAB first before the filing of the revenue application. Similar to previous resets, public consultations on the proposed handbook should also be held nationwide including in the Visayas and the Mindanao field offices (or in Cagayan de Oro City where one of the entrant DUs under the First Entry Group is located). With regards the valuation, we recommend observing the same processes as done before including inception meetings, technical discussions, etc.
	<p>Section 8.1.2 Treatment of Regulatory Intervention</p>		<ul style="list-style-type: none"> • PEPOA seeks the insights of the Honorable Commission on <i>Republic Act No. 11054 An Act Providing for the Organic Law for the for the Bangsamoro Autonomous Region in Muslim Mindanao, Repealing for the Purpose Republic Act No. 6734, Entitled "An Act Providing for An Organic Act for the Autonomous Region in Muslim Mindanao," As Amended by Republic Act No. 9054, Entitled "An Act to Strengthen and Expand the Organic Act for the</i>

			<p><i>Autonomous Region in Muslim Mindanao".</i> One of our member utilities, Cotabato Light, is within its coverage. With regards regulatory intervention, Cotabato Light is one of the PBR entrants affected by regulatory intervention during the last reset.</p>
	Section 10 Performance Incentive Scheme		<ul style="list-style-type: none"> • PEPOA would like to propose that the Honorable Commission consider introducing additional customer service-related indices, other than the technical measures.
	Section 11 Adjustment of Tariff Rates		<ul style="list-style-type: none"> • With the advent of distributed energy, PEPOA suggests that the Honorable Commission come up with its proposed rules on how to incorporate said developments in the rate design. It may be in the form of amendments in the PBR Position Paper or the Distribution Services and Open Access Rules (DSOAR).
	Other Matters		<ul style="list-style-type: none"> • PEPOA would like to seek the status of the regulatory reset process for NGCP. There has been an Issues Paper released previously but no further development. Participation of the DUs

			in said reset process is important due to the capital expenditures as well as the parallelism in the regulatory framework between RTWR & RDWR, including the calculation of the Regulatory WACC among others.
--	--	--	---