



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)	Article I, Section 1.3	Currently, connection assets are made part of the Regulatory Asset Base (RAB) which determines rates for all customers. This is not fair.	Connection assets used by solely one customer should not be limited to low voltage drop wires. It should be extended to service connections with higher voltages which are solely used by individual customers.
	Article IV, Section 4.2.1	Currently, maximum average price (MAP) is expressed in per kWh. This is absurd for distribution utilities because costs don't vary with kWh. Similar to NGCP, distribution utilities are also in the wires business and operating costs are fixed whereby maximum average price is based on kW and not on kWh.	4.2.1 Subject to Articles VIII, X, XI, and XII, the maximum average price should be expressed in Php/kW and not on kWh since costs are fixed and do not vary with energy consumption. For purposes of billing customers with very low demand (ex. marginal users), kWh can be used but it should be converted to kW. All other customers shall be billed on per kW basis.
	Article IV, Section 4.3.1 (a)	Same comment as above.	(a) The actual weighted average tariff should be expressed in Php/kW for Regulatory Year t (AWAT _t) and calculated as follows... CQ _{t-1} = The total amount of demand (expressed in kW) delivered through the relevant Regulated Distribution System...
	Article IV, Section 4.13	Existing classification for assets and expenditures are not based on voltage level.	Assets and expenditures should be classified on a per voltage level. Purpose of which is to make distribution rates reflective of true costs.