

IEMOP BULLETIN NO. 2024-02 ON THE RETAIL MARKET

TOPIC : **SWITCHING TIMELINE AND PROCEDURES**
DATE : **28 NOVEMBER 2024**

On 6 September 2024, the Energy Regulatory Commission (ERC) issued its Resolution No. 13, Series of 2024, entitled "A Resolution Adopting the Omnibus Rules for Customer Choice Programs in the Retail Market" (the "Omnibus Rules") with the following objectives¹:

- a. Consolidate the rules that govern the implementation of all the Customer Choice Programs and all participants in the Retail Market;
- b. Amend, modify, repeal and/or supersede various ERC issuances related to the Retail Competition and Open Access (RCOA), Green Energy Option Program (GEOP) and Retail Aggregation Program (RAP);
- c. Provide a set of rules that are responsive to current market and technological developments, and anticipate evolution of markets;
- d. Streamline application process for license applications and renewals for Retail Suppliers; and
- e. Ensure and strengthen consumer protection, particularly against abuse of market power, and other discriminatory and anti-competitive behaviors.

This Bulletin consolidates and amends the Advisories and Bulletins which were previously issued by IEMOP in relation to **switching timelines and procedures** in the Retail Market – i.e. RCOA, GEOP and RAP. This is being issued in compliance with the obligations of the IEMOP as the Central Registration Body (CRB) under the Omnibus Rules and Market Rules and Manuals.

Separate advisories shall be issued to cover other processes in the Retail Market, including registration of Retail Suppliers and Service Providers, addition and termination of supply contracts, reversion, relocation and cessation, among others.

This Bulletin and subsequent bulletins issued by the CRB are **for guidance only** and prepared consistent with the provisions of the Omnibus Rules, issuances of the ERC and the Department of Energy and Market Rules and Manuals. As such, in case of conflict between this Bulletin and the said issuances, the latter shall prevail, and the readers are strongly enjoined to carefully read all relevant documents.

Among the salient provisions of the Omnibus Rules in respect to switching time and procedures are the following:

- Uniform general requirements for switching in the Retail Market Programs – RCOA and GEOP

¹ Section A2.1, Omnibus Rules.
IEMOP Retail Market Bulletin No. 2, 31 October 2024
Switching Timeline and Procedures

- Adoption of seven (7) working day² timeline for switching
- Adoption of five (5) working day timeline for rectification of deficiencies in switch requests
- Framework for Retail Aggregation Program

I. SUMMARY OF SWITCHING REQUIREMENTS

The table below summarizes the processes before the CRB that are relevant to the switch to RCOA and GEOP. The table refers only to the processes before submission to the CRB, and excludes relevant processes that are internal to and involves Retail Market Participants and service providers only.

To guide Retail Market Participants, the list below includes information and documents that the CRB will evaluate in relation to the switch-related requirements. Depending on the evaluation of the switch documents, clarifications and additional information may be requested to establish compliance. Further details on the procedures and requirements for the identified processes are discussed in the succeeding paragraphs.

PROCESS	REQUIREMENT	WHEN TO SUBMIT	HOW TO SUBMIT	WHO WILL SUBMIT	DETAILS FOR CHECKING
1. Pre-switching Process					
a. Retail Customer Obligations	Notice to the Network Service Provider (NSP) of intention to switch ³	at least ninety (90) calendar days prior to the intended switch date	Included in the attestation during Switch Proper	End-User and NSP	A statement on the End-user’s and NSP’s attestations that the NSP has received the notice within the said timeline.
b. Information exchange	Information of End-Users that meet the threshold for RCOA and GEOP ⁴	every fifteenth (15th) day of the month	MS form found in this link: https://bit.ly/DU-CC-EndUser-Info-Form	NSP	

² The Omnibus Rules adopts the term “business day” which is defined there ~~is~~ as the day when normal business operations take place. This shall exclude Saturdays, Sundays and Holidays. On the other hand, the WESM Rules define “business day” as any day on which the spot market is open for business, while it defines “working day” as a day (excluding Saturdays and Sundays) on which banks and financial institutions are open in the city or municipality where the principal offices of the Market Operator are located. For purposes of this Bulletin, the term “working day” as defined under the WESM Rules which share the same meaning of a “business day” as defined in the Omnibus Rule.

³ Section E2.1, Omnibus Rules.

⁴ Clause 2.3.1.1, Retail Rules and Clause 2.5.2 GEOP Procedures.

PROCESS	REQUIREMENT	WHEN TO SUBMIT	HOW TO SUBMIT	WHO WILL SUBMIT	DETAILS FOR CHECKING
	Switch Monitoring File	Every 25th of the month prior the intended switch date, or on the next working day if it falls on a non-working day; or at least 4 working days prior the intended switch other than the 26 th of the month.	Electronic mail sent to: concerned IEMOP Registration and Stakeholder Services Staff email address/es, copy furnished rss.geop@iemop.ph or rss.rcoa@iemop.ph , whichever is applicable. Use Subject: RCOA/GEOP- Qualified End-Users Switch Monitoring Sheet [Retail Supplier Short Name]_[MSP Short Name]_[Switch Date on YYYYMMDD] Please see Paragraph I(3) below.)	RE Supplier	
2. Switch Request Proper					
Submission of Switch Request	Switch Request Form	At least seven (7) working days prior to the proposed	CRSS	Primary Retail Supplier	a. Should be submitted at least seven (7) working days prior to the proposed effective date of the switch;

PROCESS	REQUIREMENT	WHEN TO SUBMIT	HOW TO SUBMIT	WHO WILL SUBMIT	DETAILS FOR CHECKING
		effective date of the switch ⁵ .	RCOA/RAP Switch Forms and Templates are available via: https://www.iemop.ph/market-reports/retail-registration-forms-and-templates/	End-User/Retail Customer MSP DU-NSP/SOLR, and/or	b. Completely and correctly accomplished; c. All attached certifications/nominations/verifications are duly signed and notarized, as applicable; and d. Signatories in the SRF and all the attached signed portions are duly supported by proof of authority and entities are authorized to transact under RCOA/GEOP and/or IEMOP-CRB.
	Nomination and Assignment of Primary Retail Supplier executed by concerned End-User		GEOP Switch Forms and Templates are available via: https://www.iemop.ph/market-reports/geop-registration-forms-and-templates/	Primary Retail Supplier	a. Submitted during switch request as part of the SRF; b. Duly signed and signatory is authorized with proof of authority; and c. Confirmed by the assigned Primary Retail Supplier.
	No outstanding balance during initial switch ⁶			NSP	a. The Retail Customer or all the members of the Retail Aggregated Group has no outstanding balance ¹ with the Network Service Provider by the time of the switch, or has agreed arrangement on the payment of remaining outstanding balance which shall be settled prior switch date.
	All applicable required documents listed in the SRF.			Primary Retail Supplier	b. Documents listed in the SRF; c. Attestations are required to be notarized d. Duly signed and signatory is authorized with proof of authority

⁵ Section E6.1, Omnibus Rules.

⁶ Section E1.3, Omnibus Rules.

PROCESS	REQUIREMENT	WHEN TO SUBMIT	HOW TO SUBMIT	WHO WILL SUBMIT	DETAILS FOR CHECKING
	Metering Requirements (for initial switch)	During switch request	CRSS	MSP, in coordination with the Primary Retail Supplier and Retail Customer	<p>a. Metering requirements and documents listed in the SRF, as applicable, should contain consistent details of the Retail Customer;</p> <p>b. Metering documents contain specifications according to metering standards and the duly accomplished Metering Installation Registration Form (MIRF).</p> <p>c. The RMSP shall procure, install, maintain and repair on behalf of the Eligible End-user, the appropriate metering facilities, which shall include but are not limited to, the ERC-type approved interval meter and the telemetering devices required to effectively communicate with its automated meter reading facilities for remote or manual data retrieval⁷</p>

II. PRE-SWITCHING REQUIREMENTS

a. Submission of Switch Monitoring File.

To submit the Switch Monitoring File referred to in item 1(c) of the table above, the Retail Suppliers shall send a switch monitoring file with the list of qualified End-User and the Retail Market program to which the End-users intend to switch (1 email per MSP per switch date with **Subject: Subject: RCOA/GEOP-Qualified End-Users Switch Monitoring Sheet [Retail Supplier Short Name]_[MSP Short Name]_[Switch Date on YYYYMMDD]**). The Switch Monitoring File submitted by the Retail Suppliers as mentioned above shall be used as reference by the MSP in providing the Grid Off-Take point/SEIN to IEMOP-CRB and the Retail Supplier.

Upon receipt of the Grid Off-Take metering point from the MSP, the IEMOP-CRB shall send the designated RCOA/GEOP Short Name and assigned RCOA/GEOP SEIN of RCOA/GEOP-qualified End-Users to the RE Supplier and MSP to be used in their submission of the switch request via the CRSS

⁷ Section D6.2, Omnibus Rules.

and in the creation of the electronic Metering Installation Registration Form (MIRF) in the CRSS, respectively. The RCOA/GEOP SEIN shall follow the numbering convention pursuant to the Retail Manual on Metering Standards and Procedures while the RCOA/GEOP Short Name shall follow the convention CCCC-NN-R where CCCC-NN are the last 6 digits of the RCOA/GEOP SEIN, and R connotes Retail Customer.

III. SWITCH REQUEST PROPER

- a. The Retail Market Participants shall ensure that the specific forms and templates for the Retail Market Program which the Retail Customer intends to participate in shall be accomplished and submitted. The SRF and Attestation Templates for RCOA and GEOP are downloadable via these links.

RCOA : <https://www.iemop.ph/market-reports/retail-registration-forms-and-templates/>

GEOP : <https://www.iemop.ph/market-reports/geop-registration-forms-and-templates/>

The switch documents should be supported by the representative's proof of authority. For guidance, the prescribed templates for proof of authority are downloadable via these links.

RCOA : <https://www.iemop.ph/market-reports/retail-registration-forms-and-templates/>

GEOP : <https://www.iemop.ph/market-reports/geop-registration-forms-and-templates/>

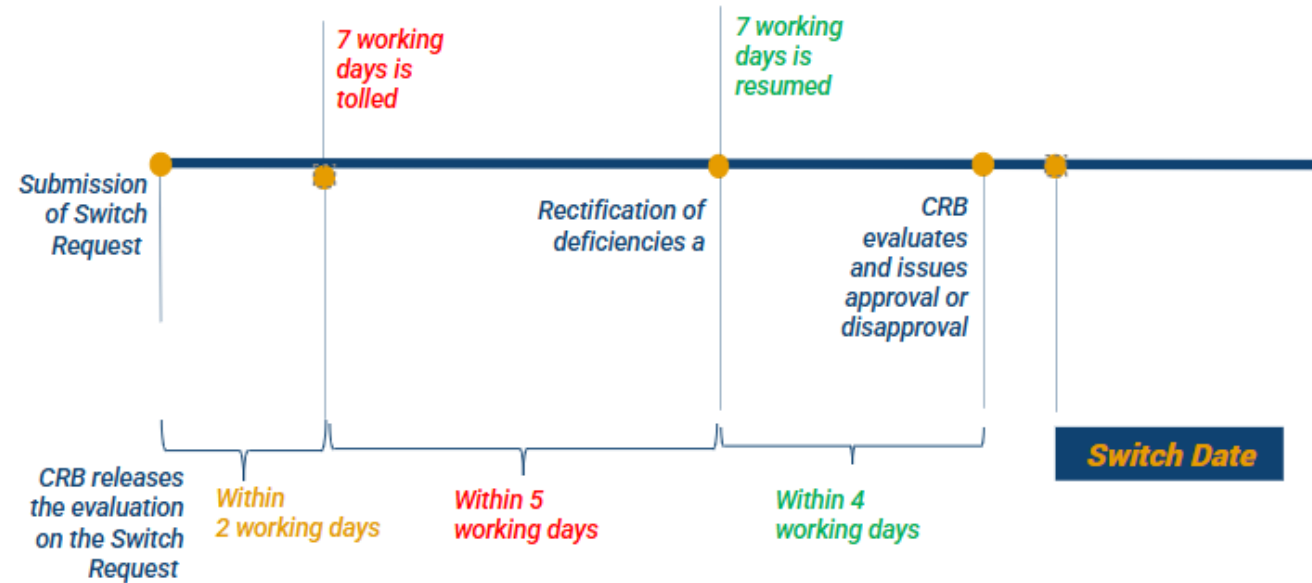
The Retail Market Participants are advised to ensure that all the details which are indicated on the switch documents – i.e. SRFs, proof of authority, attestations, metering requirements, etc.) are complete and consistent among all requirements including, but not limited to, the program that they are switching to, company name of the parties, signatories of the parties, relevant addresses, contract and agreement details such as effectivity dates covering the end-user, customer threshold level and facility details such as SIN/SEIN.

- b. Day 1 of the 7-working day Switching Timeline commences only upon submission of switch requests with the **complete and compliant** documents via the CRSS. While Section E6.3 of the Omnibus Rules gives the CRB a period of three (3) working days to check the completeness of the switch requirements, **the concerned Retail Suppliers, Retail Customers and RMSPs may expect to receive the evaluation of the CRB on the switch request within two (2) working days from Day 1.** The evaluation of the CRB shall determine whether there is a deficiency on the following:

- i. Switch documents
- ii. Prudential requirements
- iii. Metering requirements

In compliance with Section E6.5 of the Omnibus Rules, the **concerned Retail Supplier, Retail Customer/Eligible End-user or RMSP shall rectify the deficiency within five (5) working days after receipt of the CRB's evaluation.** Pending the submission of the deficiencies, the 7-working

day period shall be tolled. If after the lapse of five (5) working days, the deficiencies are not rectified, the switch request will be disapproved and a new request shall be submitted to proceed with the switching. Below is the illustration of the described switching timeline:



While switch requests may be submitted at least seven (7) working days prior the intended switch dates, the Retail Market Participants are encouraged to complete the switch documents and submit them to the CRB earlier than the said period. This gives the Retail Suppliers and their Retail Customers the opportunity to meet the intended switch date should the switch request have deficiencies. It is further recommended that the required forms be executed together with the supply contract, metering service agreement, distribution wheeling services agreement and connection agreement to manage logistical concerns between the parties.

- c. In compliance with Section E1.2 of the Omnibus Rules, only single billing arrangement will be implemented in the Retail Market. Retail customers that are currently under dual billing scheme will be required to adopt a single billing arrangement upon the regular switching to a new Retail Supplier or upon expiration of the agreement/s under dual scheme, whichever comes first.

IV. SPECIFIC GUIDELINES FOR GEOP

- a. The level of WESM participation of **Directly Connected Customers (DCCs) in the GEOP** shall only be as Indirect WESM Members to avoid a situation where they will be incurring spot trading amounts, thereby ensuring compliance with the 100% RE sourcing requirement for DCCs.
- b. RE Suppliers are likewise required to attest that its bilateral counterparties are all RE Generators and it is compliant with 100% RE sourcing requirement as required under relevant rules and regulations for GEOP.
- c. Pending system enhancements:
 - i. End-Users switching to GEOP shall be switched by the nominated Primary RE Supplier but will be enrolled in the CRSS utilizing the Contestable Module;
 - ii. The CRB shall continue to accept GEOP switch requests only within the first fifteen (15) calendar days of each month (e.g., within November 1 to 15), which shall be processed on a first-come, first-served basis. Switch requests shall be accepted for processing during office hours within this period;
 - iii. Switching from a RES/LRES to an RE Supplier and vice-versa shall be processed as a Regular Switch in CRSS, similar to a RES-to-RES transfer for RCOA.

V. SPECIFIC GUIDELINES FOR RETAIL AGGREGATION PROGRAM

a. Switch Timeline and Procedures.

In line with Section D.4.1 of the Omnibus Rules, the Retail Aggregation Program shall follow the timeline and procedures for the RCOA. The specific requirements for switching to RCOA under the Retail Aggregation Program are contained in the RCOA Switch Request Form.

Identity of Members of the Retail Aggregated Group. In line with Section I1.3 of the Omnibus Rules, the Retail Aggregator and relevant Distribution Utility are advised to coordinate the identification of the End-users forming the Retail Aggregated Group. In accordance with Section D4.1 of the Omnibus Rules, only end-users who do not meet the threshold for RCOA are allowed to be consolidated and be members of a Retail Aggregated Group. The CRB will not require the list of individual members of a Retail Aggregated Group and will solely rely on the attestations submitted by the Retail Aggregator, Distribution Utility, and Retail Metering Service Provider during the switch request.

Since the transactions of the WESM members are accounted for in the market, customers that are WESM members, specifically DCCs may not be recognized as a member of a Retail Aggregated Group.

It is advised to include in the name of a Retail Aggregated Group the term "Retail Aggregated Group" for easy identification during switching.

- b. **Execution of switch documents by the Retail Aggregator.** The members of a Retail Aggregated Group are consolidated by the Retail Aggregator who acts as their RES and is licensed by the ERC. To act as such, the Retail Aggregator shall be recognized by the CRB as the authorized representative of the Retail Aggregated Group without the need for the CRB to secure written proof of authority from its members.
- c. **Metering Requirements.** Pursuant to Section I2.2 of the Omnibus Rules, a virtual meter for each Retail Aggregated Group shall be registered with the CRB. Pursuant to Clause 2.2.4.2. of the WESM Rules, no entity is allowed to inject or withdraw electricity from the grid unless it is registered in the WESM.

The Retail Metering Services Provider shall determine the GOTP for the virtual meter of the Retail Aggregated Group which shall be confirmed by the Retail Aggregator. The Retail Aggregator confirms that the GOTP nominated by the RMSP shall be the basis for the determination of the applicable market trading node. Below are the conventions for SEINs and short names to be used in Retail Aggregation:

1. **SEIN** - 17 characters

"RV-AAABBBBCC-DDDDEE"

where:

RV - representation of virtual SEIN for retail aggregated group
AAABBBBCC - SEIN of grid off-take metering point where group is connected
DDDDEE - unique short name for group

2. **Short Name** - 7 characters

"DDDDEE-A"

where:

DDDDEE - unique short name for retail aggregated group
A - representation of short name for group

VI. REFERENCES AND INQUIRIES

a. Prescribed Forms and Templates

IEMOP shall issue a separate advisory on the prescribed forms and templates for your reference. The new SRFs and Attestation Templates may now be utilized for future switches.

The old SRFs, Attestation Templates, and procedures for switching to RCOA and GEOP shall be accepted for **switch dates until 26 February 2025 only**. Hence, for switches to RCOA and GEOP that will be effective on 27 February 2025 onwards, only the new SRF and Attestations Templates and procedures will be implemented.

b. References

The following are the references of this Bulletin:

- i. ERC Resolution No. 13, Series of 2024 - A Resolution Adopting the Omnibus Rules for Customer Choice Programs in the Retail Market
- ii. DOE DC2020-04-0009 – Guidelines Governing the issuance of Operating Permits to Renewable Energy Suppliers under the Green Energy Option Program
- iii. DOE DC2018-07-0019 – Promulgating the Rules and Guidelines Governing the Establishment of the Green Energy Option Program Pursuant to the Renewable Energy Act of 2008
- iv. WESM Rules
- v. Retail Rules
- vi. Registration, Suspension and De-Registration Criteria and Procedures
- vii. Retail Green Energy Option Program Procedures

c. Data Privacy Policy

IEMOP processes relevant personal information in accordance with its data privacy policy. IEMOP's Privacy Notice may be viewed or downloaded via <https://www.iemop.ph/about/legal-and-privacy/>.

d. Inquiries

Should you have any question, please feel free to get in touch with us through our **IEMOP Ticketing System** or email us at registration@iemop.ph.