

COMMENTS/CLARIFICATION ON THE PROPOSED DOE CIRCULAR SETTING THE RULES AND GUIDELINES FOR THE ESTABLISHMENT OF THE RENEWABLE PORTFOLIO STANDARD (RPS)

Item No.	Article No.	Concerned Provision	Comments
1	Rule 3, Section 11	Enumeration of RPS Mandated Participant	<p>Contestable Customers, just like any other consumer, would prefer to secure their power requirements at the least possible cost. Considering that power sourced from renewables are not necessarily the cheapest, RES may find it a challenge to sell the same.</p> <p>As such, it is suggested that DOE collaborate with DENR to find a way to require consumers to lessen their carbon footprint as well. With this, customers would find the need to secure power from renewables.</p>
2	WHEREAS CLAUSE	DOE Circular No. DC2015-07-0014 provided a policy adopting at least 30% share of RE in the country's total power generation through the holistic implementation of the FIT System	Does this mean that RE Facilities eligible for RPS Compliance can qualify for FIT?
3	Rule 1, Section 3c	Annual minimum incremental percentage of electricity sold by each Mandated Participant, sourced from eligible RE resources shall in no case be less than 1% of its annual energy demand over the next 10 years.	<p>Rule 1, Section 3c pegs the annual minimum increment in the RPS level on the amount of annual energy demand by the Mandated Participant, while Rule 2 Section 8 pegs it on the basis of actual total supply portfolio of the Mandated Participant.</p> <p>Does this mean that the annual minimum increment in the RPS level should be based on BOTH energy demand and actual total supply portfolio?</p>
4	Rule 2 Section 8	The minimum annual increment in the RPS level shall be initially set at 2.15% to be applied to the actual total supply portfolio of the Mandated Participant in each grid of the previous year.	

5	Rule 1, Section 3c	Annual minimum incremental percentage of electricity sold by each Mandated Participant, sourced from eligible RE resources shall in no case be less than 1% of its annual energy demand over the next 10 years.	Does this mean that the target would grow year on year from 1 to 10%?
6	Rule 1, Section 5o	RE Certificate is defined as the certificate representing all renewable and environmental attributes from 1 MWH of electricity generation sourced from a duly registered RE generating unit	<p>RE Certificate had been repeatedly mentioned but there is no general guidelines as to what it really is and the mechanism for the same.</p> <p>Though it was mentioned that the ownership and value per unit will be covered by a separate circular, it is suggested that there be at least general guide as to what it is in the proposed circular, or the circular covering the same be presented and evaluated as the current proposed Circular as it will be intertwined/closely linked.</p>
7	Rule 2, Section 7	Formula for computing Annual RPS Requirement wherein RPS0 is the total net electricity sales from all RE Sources at Year 0 (i.e. Previous Year before the Implementation Year 1), with	<p>The baseline RPS requirement to which the increment shall be added is based on the total net electricity sales from all RE sources at Year 0.</p> <p>This being the case, a Mandated Participant who at Year 0 had been supplying 50% of its customers energy from eligible RE source would be placed in the same situation as that of a Mandated Participant who have no RE supplier in terms of the requirement for yearly increase in RPS level.</p>
8	Rule 3, Section 10	The generation from the enumerated RE facilities using said RE resources are deemed eligible for compliance with the RPS	Kindly clarify what is meant by “eligible for compliance”?
9	Rule 3,	The Mandated Participant shall be	What does this mean? Would the MPs need to source

	Section 12	guided by the RE generation targets to be determined by the NREB consistent with the targets set in the NREP duly approved by the DOE.	from each of the various RE sources in the same proportion as in the installation targets prescribed by NREB/NREP?
10	Rule 4, Section 14	RE Generation allocated by the SO pursuant to the FIT Rules shall be used for compliance purposes	How would SO allocate RE Generation? Can you provide the FIT rules mentioned?
11	Rule 4, Section 15	REM shall be establish to verify compliance with the annual RPS requirement	Who has the main responsibility to monitor compliance with the RPS requirement?
	Rule 5, Section 17	The Composite Team shall submit a Compliance Report.	How will the REM be established and what will be its composition?
12	Rule 5, Section 16	Composition of the Composite Team	It is suggested that there be a broader representation-inclusion of other industry participants so that all aspects/areas could be considered. Likewise, it is suggested that the output of the Team be subjected to public consultation/discussion especially so that the same will have a great impact on the RPS Mandated Participants.