

# CONSOLIDATED COMMENTS/INPUTS ON GEA NEW DC

Gathered during PubCon via Teleconference  
(with Responses)

No.	Section	Name & Affiliation <i>(e.g. Juan Dela Cruz, DOE)</i>	Comments/ Recommendations	RESPONSES
1	<p>3.2 Components.</p> <p>3.2.1 Green Energy Tariff, to provide price signals on the commercial value of electricity generated from RE facilities resulting from a competitive process and setting of the tariff; and</p>	<p>Jack TAN, TOTALPower</p>	<p>Is the winning bid price of Php/kwh by the RE Provider is net of other charges for the transmission &amp; distribution</p>	<p>Director Mylene C. Capongcol: Actually, if not mistaken, our requirement is an all-in bid, but that is pertaining to the market operation. So the transmission services is separate - in terms of transmission services and power delivery charges.</p> <p>Asst. Secretary Redentor E. Delola: Just to clarify, 'yung ating revised design of GEAP, dati kasi because you have an off-taker - DU, diba a-allocate natin so may transimision charges 'yun. Ito po parang FIT, basically FIT with auction of tariff, so offer n'yo is generation cost lang, hindi naman kinokolekta ng transmission charges ang generators at wala din distribution charge 'yan, kasi magbabato lang ng power sa market. Nagbago na po ang design wala nang off-taker, it is same as FIT. Ibabato lang ang capacity sa market, and will be paid based on your offer.</p>
2	<p><b>Section 4. Definition of Terms. This Circular hereby adopts, by reference, the terms defined in the EPIRA, RE Act, their respective implementing rules and regulations, RPS On-Grid Rules , the Omnibus Guidelines , the WESM Rules, FIT Rules as well as the relevant DOE Department Circulars.</b></p> <p><b>Furthermore, the terms, as used in this Circular, shall be defined as follows:</b></p> <p>4.1 "Auction Round Procedures" or "ARP" refers to the procedures applicable for each round of Green Energy Auction conducted under this Circular;</p>	<p>Manny Candelaria, Citicore Power</p>	<p>May we know status of the setting of the GEAR Prices by ERC? Timeline for finalization and assurance. Thank you.</p>	<p>Asec. Delola: There's a process that should be followed in terms of setting the GEAR Prices. However, ERC has not yet finalized their schedule because they are still waiting for the policy to be promulgated. But after this promulgation, ERC will also hold their own Public Consultation for the GEAR Prices. The target auction date is October 2021 so hopefully, the ERC's process will also be completed before the final pre-bid conference before the submission of the auction so that its bidder will know the target/cap. ERC will be adjusting their timelines to achieve the October target date for auction.</p>

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3	4.6 "Green Energy Auction Reserve Price" or "GEAR Price" shall refer to the maximum price offers in PhP/kWh set by the ERC pursuant to applicable law and this Circular that shall operate as the cap(s) for Green Energy Auction conducted for the period during which such tariffs are in effect;	Manny Candelaria, Citicore Power	May we know status of the setting of the GEAR Prices by ERC? Timeline for finalization and issuance?	See item no. 2 and 7 (Answered by Asec. Delola during PubCon)
4		Jennylyn Bobiles, CEDC	The ERC will set the GEAR Price, what will be the basis in setting such price? Will it be a single price only?	Dir. Capongcol: This will be within the design the ERC will adopt and this will also then be subjected to a PubCon. But considering that there will be a sort of an installation target per technology (different characteristics and different development costs), the GEAR Prices will also vary. Still, this concern is subject to further discussion by the GEA Committee and the ERC.
5		Alberto Espiritu, CSDP	Will the GEAR Price be announced prior to the deadline for submission of offer prices by the RE Developers or Qualified Suppliers?  We understand that the GEAR Price will be set per technology? Will there also be separate GEAR Prices fo variable and non-variable RE?	See item no. 2 and 7 (Answered by Asec. Delola during PubCon)
6		Jennylyn Bobiles, CEDC	Will the GEAR Price vary depending on the requirements of the DU?	No. The GEAR price will be used as the cap for each auction round, possibly on a per technology basis but this will be under the jurisdiction of ERC and according to ERC it will be subjected to public consultations.
7		Oscar Alvarez, WaterRock Energy	Will the GEAR price be publicly announced or will it be issued confidentially to the bidders? Also, what will be the basis of the GEAR price--will it be degressed FiT, average WESM price, etc.?	Asec. Delola: ERC is looking on the current development cost of technology as one of the basis for the determination of the GEAR Price. There will be a separate PubCon for the determination of the GEAR Price and the methodology.
8		Don Mario Dia, BREA	How will the GEAR Price be determined? Will there be an explantation on the ERC process? Will there be a min and max cap? Will it be per technology?	Asec. Delola: Similar to what has been raised a while ago, during the delivery, the supplier should not have any other contracts. The GEA Committee and the ERC will look into this.

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9	4.7. "Mandated Participants" refers to the electric power industry participants mandated to comply with the RPS annual requirements set by the DOE upon recommendation of the RPS Composite Team;	Jeriel Velasco, BENEKO	What is the role/ participation of mandated participants, specifically distribution utilities in this GEAP.	The Mandated Participants particularly the DUs shall be the recipient of the RECs coming from the FIT auctioned capacities which will be distributed pro rata.
10	4.13. "Winning Bidder" refers to the Qualified Suppliers that are determined to have the most competitive bid or offer in a particular auction bid round.	Alberto Espiritu, CSDP	The term "Winning Bidders" is used interchangeably to refer to the winning Suppliers and the winning Mandated Participants. To avoid confusion, may we suggest that different terms be used in the DC to differentiate between the two groups?	Noted
11	5.3. Price Determination. The price offers of the Winning Bidders shall be the Green Energy Tariffs. The competitive discovery of prices or the Green Energy Tariff through the Green Energy Auction shall be the basis of ERC in approving the respective Green Energy Tariff of each Winning Bidder. The Green Energy Tariff shall follow the FIT determination process as provided under the FIT Rules."  The ERC shall determine the GEAR price/s for each auction round.	Theo C. Sunico, Triconti Windkraft	The competitive discovery of prices through the Green Energy Auction shall be basis of ERC in approving the respective Green Energy Tariff of each "winning bidder", would like to seek clarification that after each auction all the winning bidders would then still have to seek ERC approval for their bid price?	Dir. Capongcol: Since the design of the auction is for it to be a competitive process, the resulting price or the winning bid will be duly accepted. This may not need approval from the ERC considering that it is a process that has already undertaken several reviews on a transparent basis.  Asec. Delola: Wording should be improved. Actually, it is the DOE that will submit the results of the auction to the ERC so the winning bidder does not need to do anything but to apply for the COC and to bring its Certificate of Nomination and Certificate of Endorsement for FIT, which will all issued by the DOE.
12	<b>Section 6. Framework for the Auction.</b>  6.1 Offer. An RE Developer shall be considered a Qualified Supplier under the GEA if the RE facility being offered has no legal impediment, such as the existence of a power purchase agreement/power supply agreement with any Distribution Utility (DU) or end-user.	Michael Simon Papa, CleanTech Global Renewables Inc	Just to confirm, GEAP will not allow partial supply? Does that cover WESM as well? Say we have 20MW plant, we will not be allowed to nominate to GEAP only 15MW of it and have the remaining 5MW be sold to WESM? Note that the remaining 5MW will be sold to the market and not to DUs or ECs thus there is no contractual obligations.	Asec. Delola: Just to clarify, kung bakit hindi in-allow, kasi you only have one metering facility, so 'yung supply mo because mass dispatch, lahat napupunta sa market. There is no way for us to segregate na ito sa market lang, ito sa GEAP. In fact, the entire capacity will be paid by market based on the market prices, papasok lang si TRANSCO to pay differential from your green energy, kaya hindi in-allow. Even in FIT rules, hindi pwede na may iba, lahat ng capacity mo, nage-generate mo, napupunta sa market. 'Yun din isa sa tinignan ng katulad ng amendments, kasi dati pwede mag-offer ng certain portion lang, well, actually it is hard to segregate volumes. During real time, hindi mase-segregate 'yung in terms of MW, kasi energy nage-generate at real-time, and then wala din kasi tayo ka-bilateral, but will declare bilateral quantity yung basic bilateral contract quantity, so lahat yan napupunta talaga sa market, lahat 'yun for GEAP. If you have 20 MW plant, then offer the entire 20 MW to the GEAP.
13		Michael Simon Papa, CleanTech Global Renewables Inc.	Just a follow up to my previous question, what if we have 2 meters in 1 plant, is partial supply to GEAP still not allowed (GEAP and WESM)?	Under the current design, partial supply will not be allowed but say for example an RPS-eligible plant has a dedicated unit wholly for GEAP, then this will be allowed provided separate meters will be installed.

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14	<p>6.2 Auction Capacity Requirement. The Auction Capacity Requirement shall be determined by the GEAC based on the following:</p> <p>6.2.1 Capacity needed by the grid for sufficient supply;</p> <p>6.2.2 Levels of RE to maintain the RE generation mix target set by the DOE; and</p> <p>6.2.3 Volume of RECs in the market, to assist in the compliance with RPS requirements of Mandated Participants.</p>	Ruben Sibayan, PEMC	May I know if you will be requiring RE Registrar for the data needed to determine the volume of RECs?	Asec. Delola: We will abide by REM rules, it is already tackled in the REM rules. The REM rules also cover on how the FIT allocation for RECs will be. The GEAP and FIT will have similar process of RECs.
15		Manny Candelaria, Citicore Power	The section provides the conduct of the auction for both NEW and EXISTING RE Capacities. Kindly note that many EXISTING RE capacities were built way back in 2016 (in support of the Government's FIT installation targets) with much higher cost of RE technologies. This would not provide a level playing field for the participants. We suggest to conduct separate auctions of EXISTING and NEW RE capacities.	Dir. Capongcol: The intention is to make use of the available resources. There are projects that were not able to qualify under the FIT program so as long as they are not contracted in terms of the capacity and energy, then they might be able to participate in the auction round. DOE will try to come-up with a more specific design for the products, such as greenfield projects, to be auctioned.
16	<p><b>Section 7. GEA Guiding Principles</b></p> <p>7.1 The auction shall be conducted for New and Existing RE Capacities duly registered with the DOE with no existing power purchase agreement/power supply agreement with any DU or end-user.</p>	Manny Candelaria, Citicore Power	The section also requires that RE capacities joining the auction should have no existing power supply agreements. For the EXISTING or "stranded" RE capacities, their common options, after the last FIT race, are to sell to the spot market and/or contract with contestable customers but with very short contract period. We suggest that OPERATING RE Capacities with existing PPAs should also be allowed to participate in the auction, provided that prior to issuance of "Certificate of Endorsement for FIT", the winning RE capacities should submit proof that said PPAs have been assigned or pre-terminated.	<p>Dir. Capongcol: The capacity that will be offered in the bid round should not have any obligations or any valid power supply contracts. In case that during the time of the bidding or in the auction round you are free of any contractual obligations and you qualify in the bid, it will still then be subjected to due diligence and complete staff work that the DOE and the GEAP Committee will undertake.</p> <p>Asec. Delola: This input will still be subject to further discussion by the GEAP Committee and the ERC. In general, during the delivery, there should not be any contracts because all the volumes will be captured by a single meter and that will already be the generated volume for the GEAP.</p>
17		Jon Cleofas, MGEN	In the Auction proper, will it be on a per technology basis? Some RE technology may not be able to compete.	Asec. Delola: Yes, it will be on a per technology basis. In fact, the section for the GEAR Price is also on per technology. DOE will try provide a cap for the GEAR Price.

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18	<p><b>Section 8. Auction Mechanics</b></p> <p>8.1 Publication of the Notice of Auction. The DOE shall publish the Notice of Auction on its website and in at least one (1) newspaper of general circulation not later than the 30th of August of every year. A copy of the Notice of Auction shall also be sent by electronic mail to the ERC, TransCo, and the Market Operator.</p>	Darwin Deato, Global Clean Hybrid Energy Corp.	Do we need to wait for DOE Notice of Auction? Can we consider allowing registration in advance to become a qualified supplier for the coming auction rounds? What are the latest proposed steps to do that?	<p>Dir. Capongcol: Any interested bidder or supplier will have to wait for the notice of auction because there are peculiarities and distinct requirements in a particular auction that the DOE will be asking. It is not generic but it is important that the winning bidder will wait for the notice because stated there are the requirements, obligations, and the delivery including the Terms and Conditions that the winning bidder or interested suppliers will have to comply with.</p> <p>Asec. Delola: If a supplier already has an existing contract under the omnibus guideline basically, it had already complied with much of the requirements. The specifics of the auction will be discussed later on since the requirements will vary per auction round but most of the requirements on eligibility are already in the service contract.</p> <p>Dir. Capongcol: DOE will also look into the possibility of having a pre-reg so that there will already be a pool of qualified bidders.</p> <p>Asec. Delola: DOE might add an additional layer on the process of service contract so that the supplier can be pre-registered automatically in any auction.</p>
19		Lily Gutierrez, USAID Philippines	Since the use of the online/virtual system is widespread, consider other electronic/digital/on-line platform or even social media platforms to reach more interested bidders.	Host: Noted.
20		Alberto Espiritu, CSDP	What will be the basis for the shortlisting of bidders?	Asec. Delola: In the notice of auction, there will be a Terms of Reference (TOR) that will be provided since it should match the requirements of the system. The shortlisting will be done after the determination of the qualifications based on the Terms of Reference and the instructions to the bidders (financial, legal, technical).
21	8.3 Auction Process.	Alberto Espiritu, CSDP	How is the qualifying auction different from the final auction?	Asec. Delola: DOE will have to check the date. Note that the qualification round is different from the auction round.
22	8.3.1 The ARP shall include following information: 8.3.1.1 Auction timeline and milestones, including the dates for the qualifying and the final auctions;	Aiza Claro, UPD	How does the auction timeline looks like? Once the notice of auction is posted, how long does the auction will run?	Asec. Delola: DOE is targeting October and then they will work backwards on the timeline.
23	8.3.1.2 Total supply capacity per delivery period subject to the auction; 8.3.1.3 Type of supply (variable or non-variable RE) required, as applicable; and	Alberto Espiritu, CSDP	We understand that the GEAR Price will be set per technology? Will there also be separate GEAR Prices fo variable and non-variable RE under Section 8.3.1.3?	Host: Already answered by Asec. Delola. (GEAC is currently undergoing review)

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24	8.3.1.4 Delivery period and contract term, which shall not be less than twelve (12) years consistent with FIT.	Aboy Castro, CleanTech Global Renewables, Inc.	Section 8.3.2 refers to Section 7.3. However, there is no Section 7.3 on the Draft that is available on the website. May we know the Criteria and Requirements to become a Qualified Bidder?	<p>Dir. Capongcol: The notice of auction and the Terms of Reference will be out with a detailed requirement for a particular auction round. Only the basic framework and guidelines in the conduct of the GEAP will be discussed during this PubCon. DOE will provide a detailed and specific requirements, and we will provide enough time for the potential bidders to prepare for the auction. DOE will be addressing the objectives and goals of the energy sector particularly for the Clean Energy Scenario, NREP, and power supply security in the country.</p> <p>Asec. Delola: Further check and review the document because there is no Section 7.3 (might be Section 7.1).</p>
25	<b>Section 11. Compliance with RPS. The volume of RE and RECs supplied pursuant to this Circular shall be counted for purposes of compliance by the Mandated Participants with the RPS, as provided in DOE Department Circular No. DC2017-12-0015. The RECs shall be distributed, pro rata, to Mandated Participants paying the FIT-All.</b>	Alberto Espiritu, CSDP	Under Section 11 on Contract Award, do we understand it correctly, that it is TRANSCO which will collect from the winning Mandated Participants and pay the winning Qualified RE Suppliers?	<p>Dir. Capongcol: Yes.</p> <p>Asec. Delola: Same as FIT, for the market component, IEMOP will be the one to collect. It will then give it to TRANSCO which will be the one to pay the winning bidder the whole amount.</p>
26	<p><b>Section 12. Adoption of Certain Provisions in the FIT Rules. The Green Energy Auction adopts the Regulatory Framework (except the provisions on Coverage, Adjustments, and Degression) and Administration of FITs provided under Resolution No. 10, Series of 2010 issued by the ERC. As such, other entities involved in the implementation of FIT shall continue to discharge their responsibilities as set forth in the FIT Rules with respect to each auction round and subsequent incidents.</b></p> <p>12.1 DOE's Responsibilities. The DOE shall issue the Certificate of Nomination to each Winning Bidder within _____ days after the conclusion of the Green Energy Auction. The Certificate of Nomination shall be the basis for the eligibility of the Winning Bidder to receive Certificate of Endorsement for FIT. The DOE shall submit the Green Energy Tariff set after each auction to ERC.</p>	Julie Dulce, Meralco	If the framework/mechanism will be similar to the FIT Program, will it also exclude Geothermal and Large Hydro? New Geo and Large Hydro should be allowed to participate, as more participants will lead to more competitive auctions and lower prices.	<p>Dir. Capongcol: Yes. Actually it is a part of the discussion because in the original FIT, only the emerging technologies were included by the DOE. The department will then be moving towards an increase in the RE investment by addressing the requirements of the grid knowing that geothermal and large hydro are considered as a base load and is available 24/7. Yes, they will be part of this auction round and the DOE intends to provide specific incentives, such as the priority connection and RPS attributer that they are not able to avail with the existing FIT program.</p>

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<b>GENERAL COMMENTS</b>				
27		Alberto Espiritu, CSDP	Will the GEAR Price be announced prior to the deadline for submission of offer prices by the RE Developers or Qualified Suppliers?	Dir. Capongcol: This will be best answered by the ERC but based on the initial meeting with the GEAP Committee, it will still be subject to a PubCon (setting the GEAR Price and the methodology). All the details will be disclosed prior to the auction but this is still dependent on the decision of the ERC.
28		Jennylyn Bobiles, CEDC	Will the GEAR Price vary depending on the requirements of the DU?	Asec. Delola: The GEAR Price is not dependent on the requirement of the DU. DOE is moving away from the original design, that the DOE will integrate all the requirements of the DUs. Now, the DOE will not get the requirements from the DUs. There will be no allocation of energy in MWh. It will all be in the market. So the GEAR Price will only depend on how the ERC will calculate the price, whether it is through the LCOE or any method that the ERC will adopt.
29		Jay Layug, DREAM	Under the FIT rules and system, there are two components of the FIT price for collection purposes: the WESM spot price and FIT rate. The difference between the WESM spot price and FIT rate is called the FIT differential or the FIT allowance (FIT-All), which is approved by ERC annually pursuant to the ERC FIT Rules. In this GEAP, did we review and study these two components and how they will be paid? Is there still a reference to MW capacity of each DU for purpose of RPS compliance (which I assume is the basis of the auction capacity requirement), how can you measure which electron went to which DU?	<p>Asec. Delola: DOE is already using the FIT rules. The difference between the WESM spot price and the fit rate is called the FIT-All. This will be collected by the TRANSCO which will also be subjected to ERC's approval in an annual basis.</p> <p>The application of the Transco for the FIT-all starting the first year the deliverables were already done by the winning bidders already includes the projected requirements for this program and this will be set in a competitive basis check. It will only approximate the prices in the market so the impact for the FIT-All will be lower than the original FIT.</p> <p>There will be no reference to MWh capacity of each DU since the energy that will be generated by the winning bidders and the one that will be given to the DU is the corresponding REC that will be based on the volumes that they will acquire.</p> <p>Similar to the FIT is the pro-rating of the total energy of all the DUs that might lead to an increase the available RECs in the market so that the department can already increase the RPS. The DOE will further refine the provisions so that it will be very clear in terms of the implementation.</p>

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30		Manny Candelaria, Citicore Power	May we know the contemplated Delivery Periods? Are these Baseload, Mid-merit and Peaking? What are the target RE capacities per Delivery Period for the First Auction? What is the target start date for the First Auction and target completion date (Issuance of Certificate of Endorsment)?	Asec. Delola: The delivery period as mentioned will be in 2023-2025. DOE will provide the details on the notice of auction. In determining the capacity, it has been decided that it will be per technology. So the determination of the target per technology will be the base load that will then be the basis in determining the capacity for each technology. DOE is doing simulations to provide support to the system which will increase the RPS compliance. Everything should be finalized first before the DOE can issue a certificate of endorsement and certificate of nomination to the winning bidder.  Dir. Capongcol: DOE will check all the factors to determine the capacity per technology.
31		Julie Dulce, Meralco	How will the cost of GEAP volumes be recovered? Will it be through FIT-All? Will there be a separate filing for this?	Asec. Delola: Same to what has been explained earlier, the recovery of the cost will be through the market and the differential will be through the FIT-All. The TRANSO will be in-charge of the filing.
32		Ben-hur Benigno F. Castillo, CSDP	May we submit our position that, given the provisions of the fixing of the GEAR price cap in accordance with the FIT rules on degression in price setting, the ERC should also please consider comparing such price to be considered with the prevailing WESM average rate, which for Solar, is at around PhP5.45 per kwh from January 2021 to July 2021. This way, we can say that the pricing mechanism adopted by the ERC was also based on existing market forces.  Corollarily, my point in ERC considering the existing average WESM market rate is that it will somehow give the possibility of lessening the problem of Transco in its FIT-All management looking for funds to pay the price differentials.	Asec. Delola: Yes. This will be best answered by the ERC. There will be a PubCon that will be conducted by the ERC to discuss the determination of the GEAR Price. The weighted average price in the market will also be taken into consideration. Still, the determination of the FER Price will be made public so that everyone can express their opinions regarding it.
33		Ina Guillermo, BioPower	If the first round of Auction is for 2023, can stranded plants enter into bilateral until then?	Currently under review by GEAC
34		Oscar Alvarez, WaterRock Energy	How about Ocean technology which still has no FIT rate, will this technology be still qualified to participate? If so, will it follow the same auction procedures or will it have its own?	Dir. Capongcol: There will be no FIT rate. It will now be based on the offer price that will submitted by the RE developer, that will be submitted during the auction round.



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35		Alberto Espiritu, CSDP	To avoid confusion and avoid triggering the usual backlash whenever the term "FIT" is mentioned, may we suggest that the term "FIT" in the proposed DC be replaced, whenever appropriate, with "Green Energy Tariff" or some other term which will distinguish the "GEAP-Set FIT" from the other FIT Program?	Asec. Delola: Noted.
36		Aboy Castro, CleanTech Global Renewables, Inc.	In the previous draft, the Supplier could offer "all or a portion of the electricity generated". There is no mention in today's version of GEA. Are we allowed to nominate just a portion of our plant's capacity for the GEA?	Asec. Delola: Yes, this was the one modified from the previous draft, that there will be an allocation to the DU so the bilateral quantity can be declared. In the latest version, there will be no bilateral quantity so there will only be one metered quantity. In addition, the supplier should not have any other contractual obligations.
37		Julie Dulce, Meralco	If the mechanism will be similar to the FIT Program, will it also exclude Geothermal and Large Hydro? New Geo and Large Hydro should be allowed to participate, as more participants will lead to more competitive auctions and lower prices.	Currently under review by GEAC
38		Eloiza Ymasa, Jobin-SQM, Inc.	We have an existing solar plant with PSAs and we plan to expand its capacity but under the same meter. Can the expansion be treated as a separate plant for GEAP eligibility? Or do we have to setup a separate meter for the expansion to be eligible for GEAP? Under Section 7.1, only RE plants with no existing power supply agreements with any DU or end-users. Does end-user also cover RES? If our PSAs are only with RES, can we participate in GEAP?	Asec. Delola: The supplier should not have any other contracts. RES retail electricity supplier Dir. Capongcol: RES buying and reproducing the capacity to be offered to the market should be in compliance to the RPS. DOE will try to allocate a certain portion in the REC but given the distinct characteristic, it might not be possible. Asec. Delola: Under the RPS rules, there is a section allocated for the RECs.
39		Clarence Ignacio, SBPL/QPPL	Will there be a some sort of power procurement plan? For planning purposes, qualified suppliers may need a signal on when a potential auction for their particular type of RE	Asec. Delola: For now, there is no particular procurement plan for the GEAP. DOE will still have to check the volume of the GEAP. In terms of planning, it is better if there are potential volumes that can be seen so that there will already be an available info. DOE will still have to check how to improve the existing plans. The power supply procurement plan can be seen by the generators.
40			What are the procedures and requirements to be a qualified supplier? timeline for application?	Currently under discussion by GEAC

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41		Jon Cleofas, MGEN	In the auction design, there is concept of installation target per technology. What happens if a technology say wind with a target of 500 MW is not filled. Is this considered as a failure in the auction process?	Asec. Delola: No. If the target was not met, it can still be auctioned in the next round.
42		Alberto Espiritu, CSDP	To clarify, CSDP is not saying that the backlash against the fixed-rate FIT Program is justified. It is simply stating the fact that there is such a backlash, without regard as to whether such backlash is justified or not.	Noted
43		Darwin Deato, Global Clean Hybrid Energy Corp.	what's the maximum contract term for GEAP? Is it renewable after the contract term?	Only minimum contract term of 12 years and cannot be renewed
44		Aiza Claro, UPD	Just to clarify, is GEAP specifically for the DUs/ECs? Or is it applicable to all mandated participants in the RPS rules?	GEAP shall be applicable for all Mandated Participants under RPS On-grid Rules
45		Allee Sun, Pan Pacific Renewable Power Phils	<p>How about Large Hydropower Dams? Will there be a different allocation for this since it will take at least 5-6 years to construct?</p> <p>Will the Gear Price be higher than FIT price from Non-Renewables?</p> <p>When can we apply? After full construction?</p>	<p>Dir. Capongcol: All RE technologies that will be determined as eligible to bid under GEAP is open. All renewable energy technology like large hydro, breeder hydro. This will depend on requirement on a particular auction round. The facility should be ready at the time of delivery date prescribed in auction notice, as REMB looks into the status of the RE projects. It is a risk on your part if you bid while your project is not yet complete. Again as a general principle, the project should be ready before delivery date, meaning you have completed all the requirements like certificate of compliance with ERC, DOE requirements, ER 1-94, policies, endorsements, and service contract and testing and commissioning.</p> <p>Asec. Delola: You can already apply while in construction phase, and you can assure to have commercial operation on the target completion date, considering all the requirements. If you have large hydropower dam project now, we will look into that which is probably part of the qualification that we will do. We will look at your workplan submitted to DOE to comply with service contract. If it's impossible to meet the target, we will move you to the next auction rounds. We will take all of this into consideration once you process all applications.</p>

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46		Aiza Claro, UPD	General question on the GEAP auction design - Will all Qualified bidders see the bids posted in in real-time? Or are they going to see the bids only after it is awarded to the winning bidder?	Asec. Delola: Wala pong access ang bidder to the bids of other proponents in real-time. So after the bidding, we will deliver, pag-usapan sa GEAC, but during the submission of bids until we declare wala makikitaan ng offers, it is only GEAC and system na magrank ng offers. Nandoon kasi yan sa design ng IT platform, wala po makakakita, pag-uusapaan namin kung ilalabas ba namin yung bids ng lahat after the award.
47		Albert Alquiros, FQBC	How will the price be determined for BIOMASS wherein there are different kinds of technologies used. There is the Thermal and Anaerobic types wherein the investment costs are very much different.	Dir. Capongcol: I think it is an ERC area of expertise, we will leave it to ERC on how will provide pricing for different technologies of BIOMASS, currently right now in the BIOMASS in tariff isa lang, meaning isang FIT rate lang na determine. I understand na we still have other technology, depende later on sa ERC. We will raise this to ERC, maybe part of PubCons, pwede ulit matanong yan.
48		Tin Rojo, EDC	Can we seek clarification on the requirement that there should be an offer of full capacity. What if a power plant has partial RPS-eligible generation, how can it participate in the GEAP? For example, 3out of its total capacity fo 100MW, 50 MW is RPS-eligible.	Asec. Delola: The eligibility is per unit, so kung yung 50 MW is per unit, pwede nilang i-offer 'yun, but if 100 and 50, in the same unit, hindi ina-allow. But separate unit they can. Kumabaga, 'yung complex may tatlong units, isa lang RPS eligible, then you offer the unit, basta it is the entire unit. Seperate metering facility.
49		Jon Cleofas, MGEN	Will the winning bidder be assigned a PSA contract with a particular EC/DU?	Dir. Capongcol: Wala ng contract, binago na sa original design na intended only fro DU, so ngayon market na, similar to FIT eligible plans. Lahat napupunta sa market and then ina-allocate sa market users or consumers.
50		CEBECO 2	We may know the basis of the capacity requirement to be bid out, would this mean that the DU being mandatory REM participants can already have the sufficient prorata share with regard to our REC requirement for the particular period as set out by the rules on REM	Asec. Delola: Hindi po lahat, 'yung requirement n'yo kayo pa rin magfu-fullfill no'n. There was a recommendation to increase it to 2.52%, pero kasi sa tingin ko mahihirpaan ang DUs to comply with that, masyado abrupt 'yung increase. So 'yung one percent, 'yun pa rin ico-comply ng DUs, then GEAP will take care of the rest of requirements. Sa one percent, kayo pa din, but we might increase to 2.52%, but the RECs to comply with that, ibibgay na ang GEAP. Wala na kayo poproblemehin sa RECs, for possible increae. But 'pag may kulang pa GEAP, then that goes to DUs. As of right now yung DUs focus on your one percent requirement muna. So ano requirement niyo sa GEAP, kayo pa rin required to fill in on that.
51		Gian Karla Canales	Can new and uncontracted Geothermals participate in GEAP?	Dir. Capongcol: Yes basta bago, and prior RE Law, hindi before RE Law.
52		Allee Sun, Pan Pacific Renewable Power Phils	Does this include Ancillary Services?	Dir. Capongcol: Oo kasi ang ina-address lang ng GEA is the energy, so the market requirement including ancillary services is different matter in the market. May separate ancillary market later on, pero this one it is enegyry that we are requiring under the GEAP to meet the aspirational target na 35% RE share by 2030, and then RPS requirement of the Mandated Participants.

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53		Aiza Claro, UPD	Can DOE give estimated/indicative targets now per technology?	Asec. Delola: May simulation, but we have to finalize it pa. But again, the minimum volume is 2000 MW, which will probably increase.
54		Don Mario Dia	When will the final guidelines be presented/published?	Host: Hopefully po, for this August po.
55		Julie Dulce, Meralco	Under the FIT-All Guidelines, if the clearing price is above the FIT Rate, then gains will go to FIT-All fund to reduce the FIT-All rate. Will it be the same for GEAP?	Asec. Delola: Yes, kung mataas 'yung price, mas mababa 'yung offer, yung pera pupunta sa FIT-All, that will reduce the FIT-All na binabayaran ng consumers. 'Pag mataas naman compared sa GEAR Price, babayaran naman ng FIT-All, kaya may FIT-All, kumbaga basket, dun kinukuha 'yung short fall at pinupuno ang sobra.
56		Regie Casas, CSDP	Since each RE technology is unique from each other will GEAP bidding or auction be by technology or blended?	Dir. Capongcol: Again, magiging source 'yung determination natin on per capacity to the bidded out, or equivalent installation target, will depend on requirement for, 'yung meeting nga. 'Yung ating goal na 35% RE share by 2030 at clean enegry scenario. Ang nakikita namin dito, we will adopt certain capacity factors to determine how much capacity would be needed to meet the equivalent energy kasi yung target po is 35% RE share in the generation mix, not in capacity. For example ang solar is 16%, so we will determine kung ano requirement ng system for example, for peaking makikita naman sa market, then we will define sa specific auction round, kung ano requirement natin for technology. So baseload, of course we have yung characteristic ng wind, the basis will be yung capacity factor at requirement sa target goal.
57		Harold Silao, AC Energy	Does this mean that nomination of suppliers is an 'all or nothing' for the capacity nomination since we are not allowed to nominate only a portion of capacity?	Dir. Capongcol: Yeah, basta at the time of the bid, ibig sabhin wala s'yang obligations. Walang existing power supply agreement with any off-taker 'yung kanyang generation. Malinaw na walang ka-kontrata, so the whole of capacity should be bidded out and offered in the auction round.
58			<p>Are there penalties imposed on winning bidders that could not deliver the generated cap as per schedule committed.</p> <p>Is there a limit in the capacity that a bidder can offer.</p> <p>How long will it take to determine the winning bidders from submission of bids.</p>	Asec. Delola: Yes, that will be, kumbaga i-itemize in details will be provided in bid documents, nasa term of reference 'yung document penalties. Actually first three questions nasa bid documents na ibibigay.

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59		Danilo Panes, AC Energy	With respect to wind, will there be installation targets for onshore and offshore wind.	Dir. Capongcol: Matagal pa ang off-shore kasi even RE contracts na na-issue is still in pre-development stage. Again, tulad ng sinasabi earlier, at the time of auction round, they will be able to deliver yung capacity and enegy that they will be offering. So, makikita natin or ng GEAP, na may possible off-shore or any on-shore wind capacities ready by then, then they will be made qualified under auction. 'Yung ano lang is dapat ready kayo at na-evaluate namin na you able to meet the requirement of auction of that particular auction round.
60			<p>Will the rates be still subject to escalation such as Forex and CPI.</p> <p>In each auction, are all technologies be provided installation targets or there is an option for DOE on what technology to auction.</p>	Dir. Capongcol: I think, Sir, under the FIT rate it is part nung determination ni ERC, but as I understand this is an all-in kasama na escalation. Ang hindi lang kasama siguro is after the GEAP period kung mababa o hindi, kasi dahil buong capacity in-offer, say for example 12 or 20 years, then after syempre may iba na parameters na titignan si ERC. So we will see the next round.
61			What is the basis for determining the amount of performance bond. What are the acceptable forms of performance bond.	Still for discussion by GEAC
62		Rod	How much is the bonding requirement or bid security per MW? What type of bonds will be accepted by DOE?	Still under discussion by GEAC
			Will there be a webinar/training on how to use the online bidding platform? If yes, is it before or after the notice of auction?	Yes, it will be part of the pre-bid conference
63		Jack TAN, TOTALPower	Is the RE Developer allowed to bid if the SEOC is still under application?	Dir. Capongcol: Babalik pa rin tayo don, even you are in application stage. Kasi we know naman na solar can be build in more or less six months, but again we will validate and determine yung readiness ng facility at the time ng evaluation of bids. Ang importante po diyan nag qualify kayo sa particular requirements sa auction round.

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64		Melburgo Chiu, ZAMCELCO	The comment may not be in the proposed DOE Circular. However, on the practical side of things, the pricing and quantity is relevant to the DU only when it is delivered at its metering point. There is no mention of reference point in the reckoning of the RPS compliance but we are thinking the DU still shoulders the line rental following the almost usual practice of the DU shouldering the losses in the delivery. Do we assume this to be so?	Asec. Delola: Sir Mel, dito kasi sa GEAP na bagong design, binago 'yung kumbaga mechanics, dati kasi may off-taker na DU. So actually in the old design, we placed a cap for line rental, may nilagay, but this one hindi mapupunta sa DU yung energy. Walang mapo-provide na energy sa DU, so walang losses, walang ganun. Pareho lang sa FIT, really same as FIT. Ang pagkakaiba kasi sa Mindanao, iba pa impelementation dati ng FIT, because wala pa market, but in areas where there is already a market like in Luzon and Visayas, wala po s'yang, kumbaga hindi katulad sa Mindanao na may specific na DU na off-take ng FIT plants. Sa may market kumbaga napupunta lang sa Market, kumbaga market quantities. Yung DUs wala responsibility to get the enegry, gagawin lang nung DU is to pay the FIT-All and pay 'yung exposure sa market and the RECs will be given to them, pro-rated based on the contribution to the FIT-All . So 'yun po pagkakaiba nito sa dating design, so wala na s'ya line losses and line rentals and all of that.
65		George Ponce de Leon	With the implementation of GEAP, how will this affect the ongoing CSPs of DU?	Asec. Delola: 'Yung GEAP po will not affect on-going CSPs. Again kaya binago yung design ng GEAP kasi dati may DU off-taker. Ang ginawa sa old design in-aggregate 'yung requirement ng DUs, then 'yun 'yung pinapa-GEAP, ngayon hindi na gano'n, para na talagang FIT, FIT na talaga 'to. Hindi maaapektuhan ang on-going CSPs n'yo. Again, patuloy n'yo CSPs n'yo specially the 1% requirement in the RPS, just continue with that, you have to comply with that again. So this will not affectc your on-going CSPs.
66		Chito Trillanes	<p>What mechanisms are in place to ensure transparency in securing contracts knowing that we do not know who the beneficial owners of the suppliers/gencos and collusion is prevalent among so-called bidders?</p> <p>Do you have capability workshops for consumers in order for them to determine whether or not their DUs are entering a contract with terms and conditions beneficial to them?</p>	<p>Dir. Capongcol: Well, wala pa namang contract, the contract will be with the winning bidder and the supplier and TRANSCO, para sa REPA na tinatawag.</p> <p>Asec. Delola: Yeah, I think Dir. My, this comment or question is much more appropriate to the CSP policy of DUs, kasi yun tinatanong n'ya kung paano ang DUs, to determine whether or not the DUs are entering a contract that is beneficial to them. 'Yun dun sa ating CSP policy kaya may consumer representative sa third party - Bids and Awards Committee (BAC). 'Yun po 'yung responsibility n'ya, to ensure na 'yung competitive selection process is really followed, in a transparent and competitive manner. So dito sa GEAP, again walang DU off-taker, it is really same as FIT na ibabato sa market yung generated volumes.</p>

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67		Michael Simon Papa, CleanTech Global Renewables Inc	<p>Aside from calling the performace bond, what other penalties/sanctions will be imposed to winning bidders which will not be able to provide power by delivery date? Also, will there be considerable exemptions/considerations, say unforeseeable circumstances or force majeure events by delivery date?</p> <p>How will GEAP increase access to financing? Will the government banks be open to provide financing of projects which may be eligible for GEAP?</p>	Currently under review by GEAC
68		Ron Husmillo, Alsons Power Group	<p>Alsons Power Group eligible RE plant includes the expansion of RE plants built before 2008</p> <p>Will eligible RE plants include the expansion of RE plants built before 2008 (i.e., the effectivity of RE Act)?</p>	Currently under review by GEAC
69		Ina Bonoan, Alternergy	<p>-Will you allow auctions for sub-categories of technologies,e.g., ground-mounted vs. floating solar? onshore vs. offshore wind? the capital costs are different.</p> <p>'-Are we allowed to participate in the process for determining installation targets MW?</p> <p>'-Does the implementation of the GEAP mean no F170more fixed FIT rates will be forthcoming for those without FIT now, e.g., offshore wind?</p>	<p>'-Still for discussion by GEAC</p> <p>'-Still for discussion by GEAC</p> <p>'-Yes</p>
70		Trixie Roque	We hope there will be different capacity allocations and GEAR prices for ROR Hydro and Large hydros which differ in costs and operations	The capacity allocation is currently under review by the GEAC. While, the methodology on setting of the GEAR price will be determined by the ERC
71		Sam Baybay, ADSI	In connection with project development, how many auctions will you accomodate annually?	The Auction can be conducted on a yearly basis or as determined by the GEAC.