GUIDELINES FOR THE MONITORING OF POWER QUALITY STANDARDS FOR DISTRIBUTION UTILITIES

Topic/Issue	Comments/Suggestions	Reference Provision
GUIDELINES	 <u>EDWIN B. CANO</u> 1. LDVV is emphasized as the main voltage quality indicator. Voltage swells, voltage sags, voltage unbalance and harmonics are given little importance. These power quality problems are more frequent in distribution systems especially to industrial and commercial customers connected at three-phase supply. Suggestion: adopt the Institute of Electrical and Electronics Engineers (IEEE) accepted voltage quality indices in the paper "Indices for Assessing Utility Distribution System RMS Variation Performance", [1]. These IEEE indices are focused on all voltage problems. 2. There was no statement about the instrument that will be used for testing. I assume the instrument that will be used for measurements is a Power Quality Analyzer, for durationand magnitude can only be read by such instrument. The instrument, Power Quality Analyzer, which will be used for testing/measurement, must be of calibrated status. This will give good standing for the measurement and the instrument. The standard must emphasize the word "calibrated" with regards to the instrument. 	Pursuant to Section 43 (b) of Republic Act No. 9136, Rule 3 Section 4 (g) of its Implementing Rules and Regulations, and Articles 3.2 and 5.2 of the Philippine Distribution Code (PDC), the Energy Regulatory Commission (ERC) hereby adopts and promulgates the following Guidelines for the Enforcement of Power Quality Standards.
	For small Distribution Utilities, there could be problems regarding shortage in manpower and resources to conduct a	

Scope	monthly voltage survey of all connection points. What might be practicable is to measure selected connection points in a feeder or circuit. The selected connection points shall then be changed from month to month until such time that all customers will be covered by this voltage survey. By doing so, the distributor would be able to immediately make the necessary adjustments like changing the tap changer setting of the distribution transformers to be able to meet the prescribed voltage variation limits. <u>THERMOSCAN SERVICES, INC.</u> Suggest addition of a category "f" - "f" – Customer and/or End User A person or entity supplied with electric service under a contract with a Distributor or Supplier. Any person or entity requiring the supply and delivery of electricity for its own use.	Article 2. Section 1. Scope. These Guidelines shall apply to: a) Privately-owned Distribution Utilities; b) Electric Cooperatives; c) Local government unit owned-and-operated Distribution Utilities; d) Entities duly authorized to own, operate and maintain Distribution facilities within the economic zones; and e) Other duly authorized entities engaged in the Distribution
Definition of Terms	THERMOSCAN SERVICES, INC.Suggest inclusion of definition of harmonics and Non-linear equipment or devices as paragraph "g" and "k", respectively:"g" – Harmonics shall be defined as sinusoidal voltages and currents having Frequencies that are integral multiples of the fundamental frequency."k" – Non-Linear Equipment or Device. A component in an electrical installation utilizing silicon controlled rectifiers (SCRs) or similar switching power supplies that distort the sine waveform and produce harmonic currents or voltages that are integer multiples of the fundamental.	of Electricity. Article 2. Section 2. Definition of Terms.
VOLTAGE VARIATION	BENECO This is on the assumption that the delivery voltage at the	Article 3. Voltage Variation

	connection point of the DU and NPC/TRANSCO/GENCO are within the power quality standards provided in Chapter 3.2 of the Philippine Grid Code. What happens if the power quality standards are not met at the connection point of the DU and NPC/TRANSCO/GENCO (not the DU's fault) that resulted to variations at connection point of the DU and its customers? Will the DU be penalized?	
Nominal Voltage	MERALCO Meralco maintains several nominal voltages in its franchise area. Is a list of these nominal voltages necessary? Some of the nominal voltages we are maintaining are: - 230 / 115 volts for old accounts with dual voltage service - 216 / 125 volts for Network Area - 34.5 kV for distribution lines - 69 KV and 110 KV for subtransmission lines	Article 3. Section 1. Nominal Voltage. Each Distributor shall adopt a standard Nominal Voltage or voltages which are consistent with the design of the Distribution System for its entire service area and for each of the districts, zones, or work centers into which the Distribution Systems are divided.
Limits	<u>EDWIN B. CANO</u> The monitoring of voltage at the Connection Points, which is defined in the standard as the points where MV customers are connected/metered or the primary of the distribution transformers (DT) in the case of low voltage customers is too much in terms of monitoring points. There are many and maybe thousands of DTs installed in a franchise area so these monitoring points may not be realistic. In the paper	Article 3. Section 2. Limits. Each Distributor shall ensure that no under-voltage or over-voltage is present at the connection point of any User during normal operating conditions. For this standard, connection points shall be considered as the points where medium voltage customers are connected/metered or the primary of the distribution transformers in the case of low voltage customers.
	"RMS Voltage Variation Statistical Analysis for a Survey of Distribution System Power Quality Performance", [2], a site selection process was arranged for voltage monitoring points. I suggest this procedure. I have attached the paper [2] for	A Long Duration Voltage Variation is an Under-Voltage if the RMS Value of the voltage is less than or equal to 90 percent of the nominal voltage.
	your verification. Another thing is that monitoring must be done by load classification (i.e. industrial, commercial and residential). This will be helpful to both DU and customer since voltage level and quality will be different from the	A Long Duration Voltage Variation is an Over-voltage if the RMS Value of the voltage is greater than or equal to 110 percent of the nominal value.

	different types of leads	
	different types of loads.	
	DLPC Definition of Connection Point. This should be defined clearly as this has been used a lot of times in the guidelines. We can use the definition used in the PDC.	
	<u>VECO</u> For this standard, connection points shall be considered as the points where medium voltage customers are connected/metered or the primary of the distribution transformers in the case of low voltage customers.	
	MERALCO For Clarification What will be the connection points for customers connected to 69KV and 115 kV since this section only covers medium voltage (above 1 kV up to 34.5kV) and low voltage (1 kV and below) customers?	
Measurement Procedures	EDWIN B. CANO The section presents DU personnel makes the measurements without any third party or technical witness or ERC representative. See Philippine Distribution Code (PDC) Section 7.9.1.3. I suggest there would be some kind of a	Article 3. Section 3. Measurement Procedures. A Distributor shall make voltage measurements for detecting variations at the metering point or at a convenience outlet of a Medium Voltage customer.
	person who will provide check and balance to the testing; it would be helpful if Institute of Integrated Electrical Engineers (IIEE) member/representative will be commissioned to witness the testing.	The voltage at the primary of a distribution transformer, which serves as connection point for Low Voltage customers, can be measured at the metering point or at a convenience outlet of the first customer served by the distribution transformer.
	<u>VECO</u>	The voltage at the primary of a distribution transformer can

The voltage at the primary of a distribution transformer can be computed, by multiplying the measured voltage at the metering point or at the convenience outlet of the first customer served by the distribution transformer with the nominal primary voltage, divided by the nominal secondary voltage. Comments: how is this done?	be computed, by multiplying the measured voltage at the metering point or at the convenience outlet of the first customer served by the distribution transformer with the nominal primary voltage, divided by the nominal secondary voltage.
MERALCO Include the customer main switch in the allowed voltage measurement locations for both medium voltage and low voltage customers. The computation of the primary voltage of a DT using the measured secondary voltage is relatively easy to comply with since the prevailing tap-position of the DT is disregarded. If we are required to account for the taps in the computation, the results may show that we are not compliant in the voltage requirements in some areas. Another problem is that the taps of the transformers are not always visible externally. This will require a database for the tap setting of our more than 100,000 installed DTs.	
<u>CEPALCO</u> 1. The proposal to measure every month the voltage variations at the secondary side of ALL distribution transformers will be costly to implement. We suggest that for low voltage customers the measurements of secondary voltages of distribution transformers shall be limited to an adequate sample of distribution transformers located at strategic locations in each substation feeder. The suggested locations of	

	 distribution transformers for voltage variation measurements are the following; (a) at points close to the substation, (b) at the ends of several (say 3 or more depending on the length of the main primary distribution line) radial feeders connected to the main feeder between the distribution substation and the farthest end of the main feeder, and (c) at the points of the primary distribution line farthest from the substation. 2. It is also recommended that measurement for voltage variations of distribution transformers be allowed at the secondary leads of a distribution transformer, or within one of the first sections of secondary distribution lines emanating from the distribution transformer, in addition to those enumerated in the draft Guidelines. 3. The computation for the primary voltage of a distribution transformer based on measured secondary voltage must also take into consideration the actual turns ratio and the present tapping of the distribution transformer so that the primary voltage can be correctly calculated. 	
Probability Level	DLPCThis probability is okay as long as the utility has the data for all connection points. Having this data is not practical considering that a utility has thousands of connection points.DLPC alone has more than 10,000 connection points.MERALCO Obtaining this information will require massive resources for Meralco, which currently has 639 distribution feeders and around 93,700 transformer locations within its franchise area First option:	Article 3. Section 4. Probability Level. Each Distributor shall be allowed a probability level, of not lower than 95 percent, that all connection points for each feeder should have measurements of voltages within the limits specified in Section 3.2.3.3 of the PDC.

Measurement of voltages shall be at the substation busses	
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been doing this in the past and this methodology was also	
used and accepted by ERC (ERB) before.	
EDWIN B. CANO	Article 3. Section 5. Voltage Outside the Limits not
Voltage variations during scheduled maintenance of DU	Considered a Violation.
	Voltage outside the limits specified in Section 2 shall not be
	considered a violation of this rule when such variations:
	a) Arise from operation of the affected customer's equipment
	at low power factor;
5	b) Arise from unbalance operation of the affected customer's
Suggestion: Omit item (c) from the list.	equipment; or
	c) Arise from scheduled maintenance on equipment.
o ,	
	used and accepted by ERC (ERB) before.

not be considered a violation of the utility.	
MERALCO For clarification: 1. How low should be the power factor? 2. How much unbalance? 3. Scheduled maintenance on equipment by the customer, distribution utility or TransCo?	
 Add in the Exceptions: 1. Arise from the operation of Customer's loads in excess of their contracted capacity with the distributor 2. Arise from the presence of illegally tapped/connected services 	
<u>CEDC</u> With regards to Section 5 of Article III in the Guidelines for the Monitoring of Power Quality Standards for Distribution Utilities, it should also include as not a violation, when the voltage variation outside the limit is caused by failure by the generation or sub-transmission company to provide the prescribe supply voltage to the Distributor.	
 CEPALCO	

	 Revise (a) and (b) to read as follows: a) Arise from operation of the affected customer's equipment at power factors below 85 percent; b) Arise from greater than 2.5 percent unbalance operation of the affected customer's equipment; or 	
Voltage Surveys	<u>ILPI</u> Monthly testing on the voltage <i>at all connection points</i> in each feeder is very stiff. It is suggested that this will be done on a quarterly basis.	 Article 3. Section 6. Voltage Surveys. Each Distributor shall, for voltage survey purposes and to assure compliance with the voltage requirements, make a voltage test at all connection points in each feeder of the Distribution System: a) Once during or near a monthly peak period, and b) Once during or near a monthly off-peak period.
	<u>DLPC</u> This is not practical. Utilities has thousands of connections and measuring the voltage of these connections will entail significant costs and will eventually affect the rates of customers and the efficiency of the utility.	
	There are also connection points where both residential and commercial customers share one transformer where the peak load of the latter is the off peak of the former or vice versa. Thus measuring both the peak and off peak period will be impossible.	
	DLP estimates that it will hire around 80 crews to measure monthly all its 10,000 connection points. Each crew has to carry of PQ equipment capable of measuring all the parameters required.	
	Suggestion. This can be done using simulation software,	

	which is more practical than the actual measurements.	
	<u>VECO</u> Article 3, section 2 defined the scope of connection point.	
	a. Does this mean that we have to measure the voltages under each distribution transformer?b. Or will this be limited to customers connected to the medium voltage?c. What about the residential customers or those connected to the low voltage?	
	<u>MERALCO</u> Same comments and suggestions as in Section 4."All connection points" translate to more than 93,700 measurement locations.	
	The peak and off-peak periods here are not clearly defined. What monthly peak or off peak are being referred to? System, feeder, customer type	
	<u>BLCI</u> Comment: Each DU shall make a voltage test at all connection points in each feeder of the distribution system. Suggestion: Conducting voltage test at all connection points is time consuming, thus suggesting to conduct the minimum at the first and last transformer in every feeder and the first and last customer/connection point in subject transformer.	
Required Records	EDWIN B. CANO Suggestion: kindly add the following to the required records; a. Duration of Test – time start and end of testing	Section 7. Required Records. Records of voltage tests shall be sufficient to determine/indicate the following data/information:

	 b. DU Testing Personnel – for obvious reasons c. Technical Witness/ERC Representative – as suggested above d. Instrument Used – this is obvious e. Instrument Calibration Due Date – as suggested above f. Feeder Load at time of Testing / Measurement – to indicate analysis for overvoltage or undervoltage g. Load Classification (Industrial, Commercial, Residential) - to indicate analysis for overvoltage or undervoltage h. Other Significant Distribution System/Feeder Operational Conditions – where does the power coming from, grid and/or embedded generator; is there a maintenance activity going on? i. Transformer Connection (Wye, Delta) – sometimes this has effect on voltage j. Instrument Recorded Events – the instrument, Power quality Analyzer can provide these pictures. 	 a) Location b) Serving Substation c) Feeder or Circuit Number d) Nominal Voltages e) MV Customer or Transformer Number f) Number of connected Customers g) Measured Voltage h) Date and Time voltage test was conducted
Quarterly Reports	DECORP At our current operating cost and procedures, we are able to conduct voltage and load surveys to all our 1,680 transformers twice each year. However, to comply with the guidelines, which requires twice (once during peak period and once during off-peak) monthly surveys of voltage, and monitoring and recording variations of other types of power quality standards (Art. IV, Sec. 1), we may opt to install electronic meters and current transformers for 3-phase transformer installation, and purchase portable power analyzer for 1-phase transformer installations. Such additional devices approximately cost as follows: 1 unit G.E. KV2C, form 48A Bi-directional	Article 3. Section 8. Quarterly Reports. Records of monthly voltage tests shall be recorded in the prescribed format using Table-1PQ in Annex A and shall be submitted to the ERC in electronic copy using a Portable Document Format (PDF) or any other format that cannot be altered, on or before the end of the month following the quarter starting year 2005. To be included in the quarterly submission are the monthly load curve data of the Distribution System during the quarter.

multi function meter, w/ site genie monitoring system and comm port complete w/ soft switches 120,000 3 units G.E. Current Transformer, 200:5A 15,540 135,540 x 260	
35,240,400 3 units POWERMATRIX, Powermate Model 330 System Analyzer 3,571,425 Electric Plant in Service (EPIS) 38,811,825 Cash Working Capital (2 mos.) 180,000	
Total Rate Base 38,991,825 12% RORB 4,679,019 Operating Cost (Salaries: 6 personnel) 1,080,000 Revenue Requirement 5,759,019 Annualized kWh Sales 174,804,976	
Rate Impact (P/kWh) 0.0329 Moreover, procuring and installing such devices would require some time. The requirement to submit reports starting first quarter of 2005 is too soon. We recognize that other	
DUs are more prepared than others. Therefore, we recommend the submission of quarterly reports to commence by "first quarter of 2005 but not later than first quarter of 2006." Moreover, reliability performance of DUs will only be evaluated by the Second Regulatory Period, as prescribed in the DWRG. We recommend to modify this section as follows:	
"Section 8. Quarterly Reports. Records of monthly voltage tests shall be recorded in the prescribed format using Table - 1PQ in Annex A and shall be submitted to the ERC in electronic copy using a Portable Document Format (PDF) or	

	any other format that cannot be altered, on or before the end of the month following the first quarter starting year of 2005, but not later than the first quarter of 2006. To be included in the quarterly submission are the monthly load curve data of the Distribution System during the quarter."	
Distributor's Obligation to Monitor and Record Variations of Other Types of Power Quality Standards	the Distribution System during the quarter." <u>MERALCO</u> To be modified based on the final provisions of Sections 4 and 6. <u>VECO</u> 1. will "all connections points" refer to all distribution transformers? 2. will this mean that we have to measure every month the voltage at all transformer installations? <u>MERALCO</u> Same comments as in Article III, Sections 4 & 6. Monitoring should be at substation busses only and less frequent than voltage surveys because of specialized equipment and analysis required. <u>THERMOSCAN SERVICES, INC.</u> a. Uncontrolled or rampant harmonic currents spawned by non-linear loads or components in User Systems flow back to the source and have a harmful effect on the Grid and Distribution Systems.	Article 4. Section 1. Distributors Obligation to Monitor and Record Variations of Other Types of Power Quality Standards. The Distributor shall monitor and record variations of these other types of Power Quality standards; Voltage Sags, Voltage Swells, Voltage Unbalance, and Harmonics at all connection points to the Distribution System, to ensure that the Power Quality variations are within the limits specified in Section 3.2 of the PDC.
	Harmonic voltages result from harmonic currents when these interact with System impedances or when allowed to flow over long impedance paths.	

 b. The 5th harmonic, which is a negative sequence harmonic, produces a torque in the opposite direction of the normal. This negative torque can cause early breakdown of generators and similar rotating apparatus of Power Plants in the Grid. The 5th harmonic also assaults the secondary winding of power transformers shortening service life. c. The 3rd Harmonic which is a negative sequence harmonic can cause sensitive electronic or computer controls to misoperate and create problems in the operation of the Grid and Distribution Systems. 	
d. The Grid and Distribution Systems will have to spend more because the KVA requirement increases with harmonic loading;	
e. Increased Technical Losses Because of the higher frequencies, the heating effect of harmonics can reach up to 5 times that of the fundamental (60 HZ). This increases the heat losses in all system components and may require the setting of a higher Loss Cap.	
f. Personnel Safety Uncontrolled Harmonics have caused and will continue to cause electrical fires specially in User Systems. By adopting a standard of 5% THD, the severity of the condition is lowered, bringing down the risk of fires and possible injury to personnel.	

	Other Power Quality Standards Harmonics Harmonics (as defined under Section 2, paragraph g, Article II) result from the use or operation of non-linear equipment or devices in the Grid, Distribution, and User Systems.	
	THD/TDD As specified under the PDC, Chapter 3, Article 3.2, paragraph 3.2.4, the THD of the voltage and TDD of the current of User Systems shall not exceed 5%.	
	Distributors as Customer/End User From the standpoint of the Grid Owner and System Operator, Distributors are loads and are User Systems. For this reason, they are covered by pertinent provisions under 3.2.4.4 and 3.2.4.5 of the PDC;	
	Harmonic Measurement – Meters In addition to the requirements under 8.4 Chapter 8 (Metering Equipment Standards), Distributors shall provide for updated/upgraded meters which shall measure and locally display on real time, the THD levels of User Systems;	
	Compliance Reporting End Users shall, within one (1) year from the date of the promulgation of these Rules, submit a Compliance Report to the ERC thru the Distributor. End Users shall adopt such harmonic mitigation programs or systems necessary for meeting or complying with the Standard of 5% THD/TDD on Harmonics.	
Mitigation of the	<u>ILPI</u>	Article 4. Section 2. Mitigation of the Impact of Customer's

Impact of Customer's Loads	If in any case that a power quality problem occurs, and is found out that the cause of the problem was due to a customer's load and is was found out that it have cause damaged to other customers, who will then be liable for the damaged incurred due to the said power quality problem? <u>DLPC</u> We should consider implementing the design mitigation strategy to reduce impacts of the Customer's load causing PQ disturbance/s. This section is not clear on who should shoulder the investment required, should there be any, to mitigate the PQ problems, will it be the customer causing the PQ problem or will it be the utility?	Loads. If in relation to a Power Quality complaint, an evaluation shows that a Customer's loads cause a problem on any of the Power Quality standards mentioned in the preceding section, the Distribution Utility in cooperation with the Customer causing the Power Quality problem shall be required to design mitigation strategy to reduce the impacts of the Customer's loads.
	MERALCO Reword to: The customer shall ensure that its system shall not cause a problem on any of the Power Quality standards. If an evaluation shows that a Customer's loads cause a problem on any of the Power Quality standards the customer with the assistance of the Distribution Utility shall be required to implement a mitigating strategy to reduce the impacts of the Customer's loads with the cost to be shouldered by the customer.	
	<u>CEPALCO</u> Revise Section 2 to read as follows: Section 2. Mitigation of the Impact of Customer's Loads. If, in relation to a Power Quality complaint, an evaluation shows that a Customer's loads cause a problem on any of the Power Quality standards mentioned in the preceding section,	

	the Customer causing the Power Quality problem shall be required to design mitigation measures to reduce the impacts on the Distribution System of the Customer's loads, and the Customer shall coordinate with the Distribution Utility in the implementation of the same. In the event that the foregoing mitigation measures are not satisfactory, or the Customer cannot implement adequate mitigation measures, the Distribution Utility shall design and implement mitigation measures in coordination with the Customer, and the cost of the design and implementation of the mitigation measures shall be charged to the Customer. Customer loads causing serious disturbances cannot be satisfactorily mitigated.
ANNEX B	MERALCO Formula for computing the Probability Level for each Feeder. Probability Level = [(N _T - N _{OL})/N _{T]} X 100% To be modified based on the final provisions of Article III, Sections 4 & 6. CEPALCO COMMENT: The formula for computing Probability Level for each Feeder should also be changed to suit the limited number of sampled Connection Points (DTs) in a Feeder, as suggested above for Article III, Section 3.

GUIDELINES FOR THE MONITORING OF RELIABILITY STANDARDS FOR DISTRIBUTION UTILITIES

Topic/Issue	Comments/Suggestions	Reference Provision
RECORDING		
REQUIREMENTS	EDWIN B. CANO	
	Required Records, (a) – The phrase "became aware" is too	Article IV, Section 2
	loose. A distribution operator must be aware at all times if	A) Starting date and time the Distribution Utility became
	there would be an outage. It can be understood from the	aware of the Interruption;
	statement that after one hour of outage and the operator "became aware" of the outage then the duration for the	
	outage is just	
	starting. Alarms are provided at DU substation so the	
	statement must emphasize active and not passivity.	
RELIABILITY	ILPI	Article III, Section 1
INDICES	Reliability Indices	System Average Interruption Frequency Index (SAIFI) is the
		average number of Interruptions per Customer during the
	There are inconsistencies in the definition specified in this	year. It is calculated by dividing the total annual number of
	section against Annex B – Formulas for Reliability Indices.	sustained Customer power Interruptions by the average
	CAIEL CAIDL and MAIEL are coloulated using annual data	number of Customers served during the year.
	SAIFI, SAIDI, and MAIFI are calculated using annual data while in Annex B uses figures on a monthly basis. Which	
	of the two definitions will be considered?	

	<u>ILPI</u> It has been observed that the account number of customers has no relevance on the interruption report. Hence, it is suggested that the total number of customers affected be reflected in the table instead of the account number of each customer.	Annex A, Table-1R
GENERAL PROVISIONS	<u>DLPC</u> Keeping of Records. Utility should be allowed to keep records of interruption of only up to 5 years. The utility shall have the option to discard or keep the records.	Article I, Section 2c Each Distribution Utility shall keep records of Interruptions of service on its primary Distribution System and shall make an analysis of the records for the purpose of determining steps to be taken to prevent recurrence of such Interruptions.
DEFINITION OF TERMS	<u>DLPC</u> Definition of Adverse Weather. This definition should also include earthquakes and not just weather. However, since this definition is defined by PDC then there is also a need to revise the definition used in the PDC.	Article II, Section 2b "Adverse Weather" refers to a weather condition that result in abnormally high rate of Forced Outages for exposed Components while such condition persists, but does not qualify as a Major Storm Disaster. An Adverse Weather condition can be defined for a particular System by selecting the proper values and combinations of the weather conditions reported by the Weather Bureau including thunderstorm, wind velocity, precipitation, and temperature.
SPECIFICATION OF DATA INCLUSIONS AND EXCLUSIONS	DLPC Specifications for data inclusion. The section does not mention about sub-transmission assets owned by DUs. Will this mean that interruption at this level will be excluded?	Article III, Section 2 Specification of Data Inclusions. A power Interruption shall include any Outage in the primary Distribution System, extending from the distribution substation to the distribution transformers, which may be due to the tripping action of protective devices during faults or the failure of primary distribution lines and/or transformers, and which results in the loss of service to one or more Customers or Users.

FILING REQUIREMENTS	<u>DLPC</u> Five year historical data is not available. The required reporting format before was CIT/IFR which is kwhr based while the new reporting format (SAIFI/SAIDI) is customer based. Normalizing the former with the latter is not possible since no customer data corresponds to our IFR/CIT data.	Article V Section 1 Petition for Approval of Performance Targets. Every Distribution Utility shall file a petition for the approval of performance targets for SAIFI, SAIDI, and MAIFI before the end of the first semester of the year 2005. The targets shall be based on the applicant's 5-year historical data. The data shall be recorded using Table-1R in Annex A. For available historical data that were recorded in different formats, a Distributor shall be allowed to normalize the data in order to comply with the requirement using Table-1 in Annex A.
FILING REQUIREMENTS	DLPCIn connection with Art V Sec 1 comment, we would not be able to get accurate data since five year historical data is not available.Also, basing the performance target using the mean will not be fair. A utility who is not performing well with reliability will have an easy task to improve while utility with exceptional performance will have a hard time improving and will be costly in improving its reliability figure. This will penalize performer now and will reward poor performer.	Article V, Section 2 Setting of Performance Targets. Performance targets for each Distribution Utility shall be set using the mean of the complete five year or five year normalized historical data, with one standard deviation above and below the target to allow for normal fluctuations in performance.
ANNEX A	<u>DLPC</u> The column for account no. of customers affected is impractical. A feeder having 10,000 customers connected to it has to be listed into this column. This will consume 100 pages of report just to report the 10,000 customers interrupted. Suggest that this column should be changed to no. of customers affected.	Table-1R, Annex A

RECORDING REQUIREMENTS	DECORP "Required Records" The "date and time interruption was initiated" should be included, to distinguish it from "starting date and time the DU became aware of the Interruption." Such will also give sense to "Duration of the Interruption", which is the difference of the "date and time service was restored" and the "date and time interruption was initiated", as defined in Art. II, Sec. 2 (n). We recommend to modify this section as follows: a) Starting date and time the Distribution Utility became aware of the Interruption; x x x i) Date and time Interruption was initiated; j) Date and time service was restored; k) Duration of the Interruption I) Whether the Interruption was scheduled or unscheduled. Moreover, Table -1R should also be modified to account for the "date and time interruption was initiated."	Article IV, Section 2 Required Records. Records on interruptions shall be sufficient to determine the following: a)Starting date and time the Distribution Utility became aware of the Interruption; b)Location of the outage (town or city and Barangay or Subdivision); c)Circuit number(s) of the distribution circuit(s) affected; d)Number of Customers affected; e)Service account number or other unique identifier of each Customer affected; f)Description of the cause of the Interruption; g)Weather conditions at time of Interruption; h)System Component(s) involved (e.g., distribution substation, primary lines, distribution transformer, etc.) i)Date and time service was restored; j)Duration of the Interruption;
		k)Whether the Interruption was scheduled or unscheduled.

FILING REQUIREMENTS	<u>DECORP</u> "Petition for Approval of Performance Targets" Installing a functional Outage Management System (OMS), which will be used in normalizing our 5-year historical interruption data, may take considerable time. Activities implementing our past software applications, such as data gathering, software design and engineering, program coding or commercial software evaluation, software installation user training, and documentation, took 6 to 18- months. The deadline for filing the approval of performance targets for SAIFI, SAIDI and MAIFI specified in this section is too soon.	Article V, Section 1 Petition for Approval of Performance Targets. Every Distribution Utility shall file a petition for the approval of performance targets for SAIFI, SAIDI, and MAIFI before the end of the first semester of the year 2005. The targets shall be based on the applicant's 5-year historical data. The data shall be recorded using Table-1R in Annex A. For available historical data that were recorded in different formats, a Distributor shall be allowed to normalize the data in order to comply with the requirement using Table-1 in Annex A.
	However, we recognize that other DUs are more prepared than others. Therefore, we recommend the filing of performance targets should be "from third quarter of 2005 to second quarter of 2006." Such will spread the workload of the Commission. Moreover, reliability performance of DUs will only be evaluated by the Second Regulatory Period, as prescribed in the DWRG. We recommend to modify this section as follows:	
	"Section 1. Petition for Approval of Performance Targets. Every Distribution Utility shall file a petition for the approval of performance targets for SAIFI, SAIDI, and MAIFI before the end of the first semester of the year 2005 from third quarter of 2005 to second quarter of 2006. The targets shall be based on the applicant's 5-year historical data. The data shall be recorded using Table-1R in Annex A. For	

	available historical data that were recorded in different formats, a Distributor shall be allowed to normalize the data in order to comply with the requirement using Table-1 in Annex A." In conjunction with the preceding discussion, we also recommend to modify Art. VI, Sec. 1 "Quarterly Reports" as follows: "Section 1. Quarterly Reports. Each Distribution Utility shall	
	submit may start submitting quarterly Interruption reports (presenting monthly data) for its Distribution System, on or before the end of the month following the first quarter starting year of 2005, but not later than the first quarter of 2006, using the standard format prescribed in Annex-A sufficient to compute the annual indices for SAIFI, SAIDI and MAIFI. The data shall be submitted in electronic copy using a Portable Document Format (PDF) or any other format that cannot be altered."	
ANNEX A	<u>BENECO</u> May we recommend that the <u>Number of Customers</u> <u>Affected</u> will be reported under column 9 instead of the <u>Account Number of the Customers Affected</u> . In the computation of the reliability indices the account numbers are not needed but rather the number of customers affected. Assuming there are 1000 account numbers affected then we will be encoding 1000 account numbers for this column alone. We suggest that if the Commission needs the Account Numbers and other relevant data of those affected during interruption, these should be reported in a separate table/database but not necessarily in the	Annex A Table 1R

	interruption report table (table-1R).	
DEFINITION OF TERMS	<u>MERALCO</u> Adverse Weather" refers to a weather condition that result in abnormally high rate of Forced Outages for exposed Components while such condition persists, but does not qualify as a Major Storm Disaster. An Adverse Weather condition can be defined for a particular System by selecting the proper values and combinations of the weather conditions reported by the Weather Bureau including thunderstorm, wind velocity, precipitation, and temperature.	Article II, Section 2. Adverse Weather" refers to a weather condition that result in abnormally high rate of Forced Outages for exposed Components while such condition persists, but does not qualify as a Major Storm Disaster. An Adverse Weather condition can be defined for a particular System by selecting the proper values and combinations of the weather conditions reported by the Weather Bureau including thunderstorm, wind velocity, precipitation, and temperature.
	A definite value should be given like 5% of the total number circuits in the area tripped simultaneously due to a wind velocity as reported in the locality.	
	Definition of Terms. "Major Storm Disaster" refers to a weather condition wherein the design limits of Equipment or Components are exceeded, and which results in extensive mechanical fatigue to or failure of	Article II, Section 2 "Major Storm Disaster" refers to a weather condition wherein the design limits of Equipment or Components are exceeded, and which results in extensive mechanical fatigue to or failure of Equipment, widespread Customer Interruption, and unusually long service restoration time.
	Equipment, widespread Customer Interruption, and unusually long service restoration time.	
	Remove "wherein the design limits of Equipment or Components are exceeded, and which results in extensive mechanical fatigue to or failure of Equipment," Take into consideration the Public Storm Signal issued by PAGASA	

DEFINITION OF TERMS	<u>MERALCO</u> Definition of Terms. "Sustained Outage" refers to a state of zero voltage of a Component that lasts greater than five (5) minutes. Replace with "Sustained Interruption" to distinguish it with "Momentary Interruption" and to qualify the definition for "Interruption Duration"	Article II, Section 2 "Sustained Outage" refers to a state of zero voltage of a Component that lasts greater than five (5) minutes.
SPECIFICATION OF DATA	 <u>MERALCO</u> Specification of Data Exclusions. f) Outages due to other events that the ERC shall approve after due notice and hearing. <i>Modify bullet <u>f</u> and add bullets <u>h</u> & <u>i</u> as shown</i> f) Outages due to other events that the ERC shall approve after due notice and hearing such as: earthquakes, floods, civil disturbances, coup d' etat h) Outages due Fire/conflagration i) Outages due to Third party action such as sabotage and vehicular accidents 	 Article III, Section 3 Specification of Data Exclusions. The following events shall be excluded in the calculation of the Reliability indices: a)Outages that occur on the secondary lines of the Distribution System; b)Outages due to generation, transmission line, or transmission substation failure; c)Planned or Scheduled Outages where the Customers or Users have been notified at least three (3) days prior to the loss of power; d)Outages that are initiated by the System Operator/Market Operator during the occurrence of Significant Incidents or the failure of their facilities; e)Outages caused by Adverse Weather or Major Storm Disasters which result in the declaration by the government of a state of calamity in the franchise area of the Distributor; and

		f)Outages due to other events that the ERC shall approve after due notice and hearing.
RELIABILITY REPORTS	<u>MERALCO</u> Quarterly Reports. Each Distribution Utility shall submit quarterly Interruption reports (presenting monthly data) for its Distribution System, on or before the end of the month following the quarter starting year 2005, using the standard format prescribed in Annex-A sufficient to compute the annual indices for SAIFI, SAIDI and MAIFI. The data shall be submitted in electronic copy using a Portable Document	Article VI, Section 1 Section 1. Quarterly Reports. Each Distribution Utility shall submit quarterly Interruption reports (presenting monthly data) for its Distribution System, on or before the end of the month following the quarter starting year 2005, using the standard format prescribed in Annex-A sufficient to compute the annual indices for SAIFI, SAIDI and MAIFI. The Interruptions resulting from either scheduled or unscheduled outages on lines or substations owned by
	Format (PDF) or any other format that cannot be altered. The quarterly report should also include calculation of the average minutes of interruption per customer due to	Transco are to be accounted for in the "power supplier" category. The category "major storm disaster" represents
	causes in each of the following categories: Power Supplier, Major Storm Disaster, Scheduled, and All Others.	service interruptions from conditions that cause many concurrent outages because of typhoon that exceed design assumptions for the lines.
	The Interruptions resulting from either scheduled or unscheduled outages on lines or substations owned by Transco are to be accounted for in the "power supplier" category.	The category "scheduled" refers to interruptions resulting when a distribution transformer, line or Distributor owned substation is deliberately taken out of service at a selected time for maintenance or other reasons.
	Modify Paragraph 2 to include the recommendations in Article III, Section 3:	The "all other" category includes outages primarily resulting from emergency conditions due to Equipment
	 Outages due to other events that the ERC shall approve after due notice and hearing such as: earthquakes, floods, civil disturbances, coup d' etat Outages due Fire/conflagration 	breakdown, malfunction or human error.

- Outages due to Third party action such as sabotage and vehicular accidents	
The category "major storm disaster" represents service interruptions from conditions that cause many concurrent outages because of typhoon that exceed design assumptions for the lines.	
Modify Paragraph 4 based on the recommendation in Article II, Section 2 using Public Storm Signal instead of design limits	
The category "scheduled" refers to interruptions resulting when a distribution transformer, line or Distributor owned substation is deliberately taken out of service at a selected time for maintenance or other reasons.	
The "all other" category includes outages primarily resulting from emergency conditions due to Equipment breakdown, malfunction or human error.	
MERALCO Interruption Reports Table – 1R	
For Clarification: Do we have to report each and every interruption? An interruption of a circuit may involve more than 50,000 account numbers or customers. Listing all affected accounts for every interruption would be impractical. Recommendation:	

	-	
	Replace "Acct. No. of Cust. Affected" column with No. of	
	Customers Affected.	
DEFINITION	MERALCO	Article III, Section 1
TERMS	Definition of Terms.	System Average Interruption Duration Index (SAIDI) is the
	(i) "SAIDI" refers to the average customer-minutes of	average Interruption Duration per Customer during the year.
	interruption per customer.	It is calculated by dividing the annual sum of customer-
		minutes of sustained power Interruptions by the average
	Include sustained in the definition	number of Customers served during the year.
	(i) "SAIDI" refers to the average customer-minutes of	
	sustained interruption per customer.	
ANNEX A	CEDC	Annex A, Table 1-R
	As to Table-1R in Annex A, slight variations in the format	
	should be allowed to suit the distributor concerned. Like in	
	the case of distribution utilities operating in economic	
	zones, which most likely has a small coverage area, the	
	columns for "Town or City Affected" and "Barangay or Subdivision Affected" does not apply. In these cases, the	
	circuit or feeder number should suffice.	
RELIABILITY	BLCI	Article III, Section 1
INDICES	Comment: Computation of SAIFI and SAIDI is divided by	System Average Interruption Duration Index (SAIDI) is the
	average number of customers served during the year,	average Interruption Duration per Customer during the year.
	since every DU is required to monitor monthly & submit	It is calculated by dividing the annual sum of customer-
	quarterly to ERC, we recommend that the divisor is by	minutes of sustained power Interruptions by the average
	average number of customers served during the month.	number of Customers served during the year.
	- · · · · ·	
ANNEX A	BLCI	Annex A, Table 1-R
	Interruption Reports for Reliability Standards	
	Comment: Clarification for sub-heading of column 9	
	whether we will include the "account numbers" of	
	customers affected or "number" of customers affected only.	

GENERAL PROVISION	<u>CEPALCO</u> General Obligations of a Distribution Utility (c) Each Distribution Utility shall keep records of Interruptions of service on its primary Distribution System and shall make an analysis of the records for the purpose of determining steps to be taken to prevent recurrence of such Interruptions.	Article I, Section 2 c)Each Distribution Utility shall keep records of Interruptions of service on its primary Distribution System and shall make an analysis of the records for the purpose of determining steps to be taken to prevent recurrence of such Interruptions.
	COMMENTS: Delete the word "primary". Replace the word "prevent recurrence" with the words "reduce the frequency and duration of occurrences".	
SPECIFICATION OF DATA EXCLUSIONS	<u>CEPALCO</u> Specifications of Data Exclusions (e) Outages caused by Adverse Weather or Major Storm Disasters which result in the declaration by the government of a state of calamity in the franchise area of the Distributor; and COMMENTS:	
	 (1) Revise Section 3e to read as follows: "Outages caused by Adverse Weather or Major Storm Disasters which result in the outage of at least 20% of the customers of the Distribution Utility; and;" (2) We suggest that interruptions be excluded which are due to the deliberate interruption of portions of the primary distribution system for the purpose of ensuring safety during occurrences of fires or floods. 	 b)Outages due to generation, transmission line, or transmission substation failure; c)Planned or Scheduled Outages where the Customers or Users have been notified at least three (3) days prior to the loss of power; d)Outages that are initiated by the System Operator/Market Operator during the occurrence of Significant Incidents or the failure of their facilities;

		e)Outages caused by Adverse Weather or Major Storm Disasters which result in the declaration by the government of a state of calamity in the franchise area of the Distributor; andf)Outages due to other events that the ERC shall approve after due notice and hearing.
RECORDING REQUIREMENTS	<u>CEPALCO</u> Outage Management System (OMS). Each Distribution Utility shall maintain an automated outage management system (OMS) sufficient to determine a history of sustained electric service Interruptions experienced by each Customer. The OMS shall have the ability to access data for each Customer in order to determine a history of electric service Interruptions. Data shall also be sortable by each of the following factors:	Article IV, Section 1 Outage Management System (OMS). Each Distribution Utility shall maintain an automated outage management system (OMS) sufficient to determine a history of sustained electric service Interruptions experienced by each Customer. The OMS shall have the ability to access data for each Customer in order to determine a history of electric service Interruptions. Data shall also be sortable by each of the following factors:
	 COMMENTS: (1) Delete the word "automated" in the first sentence; insert the words "with an electronic database" after "outage management system (OMS)". In the second sentence, delete the words "for each Customer". (2) We suggest that the Cause codes have field sizes of three characters (e.g. 001-human being; 002-lightning; 312-unknown), instead of a mix of two and three characters. We suggest the same field sizes of three characters for the Equipment Failed codes. 	 a)Town/s or City/Cities affected, b)Barangay or Subdivision affected, c)Substation affected, d)Circuit Number. e)Service Account Number And in combination with the following factors: f)Number of Interruptions in reporting period, and

		g)Number of hours of Interruptions in reporting period.
		giveniber of hours of interruptions in reporting period.
FILING REQUIREMENTS	<u>CEPALCO</u> Setting of Performance Targets. Performance targets for each Distribution Utility shall be set using the mean of the complete five year or five year normalized historical data, with one standard deviation above and below the target to allow for normal fluctuations in performance.	Article V, Section 2 Setting of Performance Targets. Performance targets for each Distribution Utility shall be set using the mean of the complete five year or five year normalized historical data, with one standard deviation above and below the target to allow for normal fluctuations in performance
	COMMENTS: Delete the words "and below", and replace the word "target" with the word "benchmark". The Performance Target should be one standard deviation above the benchmark (the mean of five years of indices), not "above and below". Only upper limits need to be established for the reliability indicators; SAIFI, SAIDI, and MAIFI figures below the benchmark indicate performances better than the benchmark.	
RELIABILITY REPORTS	<u>CEPALCO</u> Quarterly Reports. Each Distribution Utility shall submit quarterly Interruption reports (presenting monthly data) for its Distribution System, on or before the end of the month following the quarter staring year 2005, using the standard format prescribed in Annex-A sufficient to compute the annual indices for SAIFI, SAIDI and MAIFI. The data shall be submitted in electronic copy using a Portable Document Format (PDF) or any other format that cannot be altered.	Article VI, Section 1 Section 1. Quarterly Reports. Each Distribution Utility shall submit quarterly Interruption reports (presenting monthly data) for its Distribution System, on or before the end of the month following the quarter starting year 2005, using the standard format prescribed in Annex-A sufficient to compute the annual indices for SAIFI, SAIDI and MAIFI. The Interruptions resulting from either scheduled or unscheduled outages on lines or substations owned by Transco are to be accounted for in the "power supplier" category.

COMMENTS: Insert the words 'and 12-month rolling values" so that the words in parentheses will read "presenting monthly data and 12-month rolling values". Data reported for SAIFI, SAIDI, MAIFI should include the 12-month rolling values; the monthly values are highly variable and not very informative as to system performance.	The category "major storm disaster" represents service interruptions from conditions that cause many concurrent outages because of typhoon that exceed design assumptions for the lines. The category "scheduled" refers to interruptions
Interruption Reports COMMENTS: The column heading that reads "Acct No. of Cust. Affected"	resulting when a distribution transformer, line or Distributor owned substation is deliberately taken out of service at a selected time for maintenance or other reasons.
should be replaced with "No. of Cust. Affected". It would be impractical to list the Account Numbers of customers affected by interruptions as this could be in the thousands.	The "all other" category includes outages primarily resulting from emergency conditions due to Equipment breakdown, malfunction or human error.

GUIDELINES FOR THE MONITORING OF QUALITY RELIABILITY INDEX (QRI)

Electric Cooperatives/Dist ribution Utilities	Comments/Suggestions	Reference Provision
	EDWIN B. CANO	Article III, Section 4
	Weighting Factors for the Different Indices –	Weighting Factors for the Different Indices. The following
	May I ask what is the basis for the arrived weighting	weighting factors which are based on the impact to the
	factors? There is so much weight given to System	customers shall be applied correspondingly to each index for
	Performance on Voltage Variation Index	Reliability and Power Quality:
		a) 25 % for SAIFI

		 b) 30 % for SAIDI c) 5 % for MAIFI d) 40 % for SPVVI
	Formula for computing SPVVI – The word "below" in the definition of SPVVI must have "and above" since limits are 90%= Voltage =110%. The formula of FBL shares the same suggestion/comment. Also, is there really a number "2" in the denominator of FBL formula? If so, where it was derived?	$\label{eq:system} \begin{array}{c} \mbox{Annex A} \\ \mbox{System Performance on Voltage Variation Index (SPVVI) is} \\ \mbox{the average percentage of the number of probability levels} \\ \mbox{below the allowable limit experienced by the Distribution} \\ \mbox{Utility. It is calculated by dividing the average number of} \\ \mbox{feeders with probability levels below the allowable limit during} \\ \mbox{a period by the total number of feeders in the Distribution} \\ \mbox{System.} \\ \mbox{SPVVI = } F_{BL}/F_T \\ \mbox{Where:} \\ \mbox{F}_{BL} = (\Sigma \mbox{Feeders with probability levels} \\ \mbox{Below the allowable limit}) / 2 \\ \mbox{F}_T = total \mbox{ of feeders in the DS} \\ \end{array}$
Davao Lights and Power Company Inc. (DLPC)	What is the basis of the formula for QRI? Please clarify the formula further of QRI as its addends has different units, SAIFI is in minutes, SAIDI is no of sustained interruptions/yr, MAIFI is no. of momentary interruptions/yr, and SPPVI is percentage. Please explain further using examples. What is the basis of the formula of SPPVI? Please explain further using examples.	Article III, Section 4 Weighting Factors for the Different Indices. The following weighting factors which are based on the impact to the customers shall be applied correspondingly to each index for Reliability and Power Quality: a) 25 % for SAIFI b) 30 % for SAIDI c) 5 % for MAIFI d) 40 % for SPVVI

Iligan Light and Power Inc., (ILPI)	Weighting Factors for the Different Indices Please elaborate further the basis on the percent allocation of the weighting factors for the different indices. How were these percentages derived?	Article III, Section 4 Weighting Factors for the Different Indices. The following weighting factors which are based on the impact to the customers shall be applied correspondingly to each index for Reliability and Power Quality: a) 25 % for SAIFI b) 30 % for SAIDI c) 5 % for MAIFI d) 40 % for SPVVI
	Formula for Computing the SPVVI By definition, SPVVI is computed by dividing the average number of feeders with probability levels below the allowable limit during a period by the total number of feeders in the Distribution System, why is that in the computation of F _{BL} it is divided by two when in the definition says it is the average number of feeders? Is it correct to assume that the FEEDERS mentioned in the guideline refer only to the Main Feeders of each Utility?	$\label{eq:system} \begin{array}{l} \mbox{Annex A} \\ \mbox{System Performance on Voltage Variation Index (SPVVI) is} \\ \mbox{the average percentage of the number of probability levels} \\ \mbox{below the allowable limit experienced by the Distribution} \\ \mbox{Utility. It is calculated by dividing the average number of} \\ \mbox{feeders with probability levels below the allowable limit during} \\ \mbox{a period by the total number of feeders in the Distribution} \\ \mbox{System.} \\ \mbox{SPVVI = } F_{BL}/F_T \\ \mbox{Where:} \\ \mbox{F}_{BL} = (\Sigma \mbox{Feeders with probability levels} \\ \mbox{Below the allowable limit}) / 2 \\ \mbox{F}_T = total \mbox{ feeders in the DS} \\ \end{array}$
Davao Lights and Power Company Inc. (DLPC)	What is the basis of the formula for QRI? Please clarify the formula further of QRI as its addends has different units, SAIFI is in minutes, SAIDI is no of sustained interruptions/yr, MAIFI is no. of momentary interruptions/yr, and SPPVI is percentage. Please explain further using examples.	Article III, Section 4 Weighting Factors for the Different Indices. The following weighting factors which are based on the impact to the customers shall be applied correspondingly to each index for Reliability and Power Quality: a) 25 % for SAIFI b) 30 % for SAIDI

	What is the basis of the formula of SPPVI? Please explain further using examples.	c) 5 % for MAIFI d) 40 % for SPVVI
Visayan Electric Company, Inc. (VECO)	 System Performance on Voltage Variation Index (SPVVI). System Performance on Voltage Variation Index (SPVVI) is the average percentage of the number of probability levels below the allowable limit experienced by the Distribution System. Comments: What are the allowable nominal voltages for service voltages: 220/230 /240 or 440/460/480 volts? We suggest that ERC (with the help of IIEE) should at least specify the acceptable nominal voltages in the country. This becomes important in determining the allowable voltage variations 	Article III, Section 2 System Performance on Voltage Variation Index (SPVVI). System Performance on Voltage Variation Index (SPVVI) is the average percentage of the number of probability levels below the allowable limit experienced by the Distribution System.
Dagupan Electric Corporation (DECORP)	"Benchmark for System Performance on Voltage Variation Index (SPVVI)" In conjunction with the discussion in item no. 3 above, we recommend to modify this section as follows: "Section 3. Benchmark for System Performance on Voltage Variation Index (SPVVI). Each	Article III, Sec. 3 Benchmark for System Performance on Voltage Variation Index (SPVVI). Each Distribution Utility shall be required to conduct voltage tests at all connection points for each feeder in its Distribution System starting for the month of December 2004 but not later than December 2005, and submit to the ERC the records using the prescribed Table- 1PQ in Annex A

	Distribution Utility shall be required to conduct voltage tests at all connection points for each feeder in its Distribution System starting for the month of December 2004 but not later than December 2005, and submit to the ERC the records using the prescribed Table- 1PQ in Annex A of the Guidelines for the Monitoring of Power Quality Standards for Distribution Utilities . The data shall be used as the basis for computing the benchmark for the System Performance on Voltage Variation Index (SPVVI)."	of the Guidelines for the Monitoring of Power Quality Standards for Distribution Utilities . The data shall be used as the basis for computing the benchmark for the System Performance on Voltage Variation Index (SPVVI).
Benguet Electric Cooperative, Inc. (BENECO)	We can not find table -1pq in the Annex A of the PDF file of the guidelines, hence the following queries?	Article III, Sec. 3 Benchmark for System Performance on Voltage Variation Index (SPVVI). Each Distribution Utility shall be required to conduct voltage tests
	Does this particular section refer only to the take-off points (connection point is not defined) of the feeders? What's the frequency of measuring the voltages (every hour, 15 minutes)? Are we going to conduct voltage test daily (31 days) for month of December?	at all connection points for each feeder in its Distribution System starting for the month of December 2004 but not later than December 2005, and submit to the ERC the records using the prescribed Table- 1PQ in Annex A of the Guidelines for the Monitoring of Power Quality Standards for Distribution Utilities . The data shall be used as the basis for computing the benchmark for the System Performance on Voltage Variation Index (SPVVI).
Manila Electric Company	Definition of Terms. (i) "SAIDI" refers to the average customer-minutes of	Article II, Section 2
(MERALCO)	interruption per customer.	(i) "SAIDI" refers to the average customer-minutes of interruption per customer.
	Include sustained in the definition (i) "SAIDI" refers to the average customer-minutes of sustained interruption per customer	
	Benchmark for System Performance on Voltage Variation Index (SPVVI).	Article III, Section 3 Benchmark for System

Each Distribution Utility shall be required to conduct voltage tests at all connection points for each feeder in its Distribution System for the month of December 2004, and submit to the ERC the records using the prescribed Table- 1PQ in Annex A of the "Guidelines for the Monitoring of Power Quality Standards for Distribution Utilities". The data shall be used as the basis for computing the benchmark for the System Performance on Voltage Variation Index (SPVVI). <i>Replace all connection points with distribution busses to align with the recommendation in the Guidelines for Monitoring PQ Standards for Distribution Utilities.</i>	Performance on Voltage Variation Index (SPVVI). Each Distribution Utility shall be required to conduct voltage tests at all connection points for each feeder in its Distribution System starting for the month of December 2004 but not later than December 2005, and submit to the ERC the records using the prescribed Table- 1PQ in Annex A of the Guidelines for the Monitoring of Power Quality Standards for Distribution Utilities . The data shall be used as the basis for computing the benchmark for the System Performance on Voltage Variation Index (SPVVI).
 Weighting Factors for the Different Indices. The following weighting factors which are based on the impact to the customers shall be applied correspondingly to each index for Reliability and Power Quality: a) 25 % for SAIFI b) 30 % for SAIDI c) 5 % for MAIFI d) 40 % for SPVVI A sample computation of QRI and an accompanying analysis should be requested. What should be the target level for QRI?	Article III, Section 4 The following weighting factors which are based on the impact to the customers shall be applied correspondingly to each index for Reliability and Power Quality: a) 25 % for SAIFI b) 30 % for SAIDI c) 5 % for MAIFI d) 40 % for SPVVI

Bohol Light Company Inc. (BLCI)	Based on the formula, the QRI will be largely influenced by the SAIDI because of its higher weighting factor and its tendency to have the highest numeric value compared with the other indices. If ERC insists on using their voltage test methodology, the SPVVI is the most difficult data to get and Meralco might not be able to comply with the December 2004 requirement Comment: System Performance on Voltage Variation Index (SPVVI) is the average percentage of the number of probability levels below the allowable limit experienced by a DU. Our question is how to determine the allowable limit of probability levels in a DU?	Annex A System Performance on Voltage Variation Index (SPVVI) is the average percentage of the number of probability levels below the allowable limit experienced by the Distribution Utility. It is calculated by dividing the average number of feeders with probability levels below the allowable limit during a period by the total number of feeders in the Distribution System. SPVVI = F_{BL}/F_T Where: $F_{BL} = (\Sigma$ Feeders with probability levels Below the allowable limit) / 2 F_T = total # of feeders in the DS
Cagayan Electric Power and Light Co., Inc.	Weighting Factors for Different Indices. COMMENT: (1) The percentage for SPVVI (Power Quality) should	Article III, Section 4 The following weighting factors which are based on the impact to the customers shall be applied correspondingly to
(CEPALCO)	also be reduced to 20% and the remaining 80%	each index for Reliability and Power Quality:

 for the Reliability Indices distributed proportionately for SAIFI, SAIDI and MAIFI. This is because Reliability is more important than Power Quality for most customers. (2) The formula for calculating ratings for the reliability indices should be set out. We suggest that the ratings for reliability performances in excess of the Targets be calculated as follows: SAIFI Rating (in percent) = (100-(100 x ((SAIFIa – SAIFIt) / SAIFIt)) Where, SAIFIa is the Actual SAIFI for the year (or the rolling 12-month value), and SAIFIt is the Target SAIFI as established in Article V, Section 2. 	b) 30 % for SAIDI c) 5 % for MAIFI
The same formula would be used for SAIDI and MAIFI. Note that Actual SAIFI below the Target SAIFI would be rated 100 percent, regardless of how far below the Target is the actual performance. Where actual performances exceed the targets, the rating would be proportionate to the amount of excess.	
ADDITIONAL COMMENT: We believe that, in addition to monitoring the probabilistic reliability indices as set out in the Guidelines, the ERC should monitor also the deterministic reliability of distribution systems, in particular the (N-1) criterion for distribution substations and main feeders. We will submit a detailed proposal to this effect.	