



**National Association of Electricity Consumers for Reforms, Inc. (NASECORE)**

Unit 226 Roxas Seafront Garden, Roxas blvd. cor. Ortigas st., Pasay City Philippines

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12 January 2026

**ENGR. ROBINSON P. DESCANZO**

President and CEO

Independent Electricity Market Operator of the Philippines

9th Floor, Robinsons Equitable Tower

ADB Avenue, Ortigas Center

Pasig City

**Subject: Request for Disclosure of Market Transaction Fee (MTF)  
Computation, Allocation, and Pass-Through Implications**

**Dear Engr. Descanzo,**

Warm greetings.

We write in the interest of **consumer information, market transparency, and informed regulatory discussion** to respectfully request disclosure of information relating to the **Market Transaction Fees (MTF)** collected by the Independent Electricity Market Operator of the Philippines, Inc. (IEMOP) in connection with the operation of the Wholesale Electricity Spot Market (WESM).

This request follows prior correspondence with the Energy Regulatory Commission (ERC) regarding the treatment of MTF and its effect on electricity charges ultimately borne by **captive consumers**, particularly those served by distribution utilities and electric cooperatives.

To facilitate a fact-based and properly contextualized discussion, we respectfully request the following information within the custody or control of IEMOP:

**A. Market Transaction Fee (MTF) Data and Collection**

Independent Electricity Market Operator of the Philippines, Inc.  
ADMINISTRATIVE SERVICES CSD

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1. The **total MTF collected annually** by IEMOP for the most recent available years, **disaggregated by grid** (Luzon, Visayas, Mindanao);
2. The **basis for MTF computation**, including:
  - a. the specific variables used (e.g., metered generation, offered capacity, dispatched energy); and
  - b. the rationale for the chosen allocation methodology.

#### **B. Allocation of MTF in Relation to Contracted and Uncontracted Energy**

3. Whether IEMOP maintains, or can reasonably derive, data showing **MTF attributable to energy associated with bilateral contracts (PSAs) versus energy traded through the spot market**;
4. If no such differentiation is made, a clarification on whether **MTF is imposed uniformly on all generation metered quantities**, regardless of whether the energy is:
  - a. sold under ERC-approved Power Supply Agreements; or
  - b. sold through WESM transactions.

#### **C. Studies, Reviews, or Policy Discussions on MTF Design**

5. Copies of, or references to, any **studies, board papers, consultations, or internal reviews** conducted by IEMOP (or previously by PEMC) concerning:
  - a. differentiated MTF treatment for contracted versus uncontracted energy; or
  - b. the impact of MTF on electricity prices passed on to captive consumers.

#### **D. Clarification on Cost Recovery and Pass-Through**

6. Without attributing fault to any market participant, a **general clarification** on whether IEMOP recognizes that MTF imposed on generators is **economically recovered through generation charges**, including those embedded in ERC-approved PSAs supplied to captive markets. We emphasize that this request is made **solely for purposes of transparency, policy analysis, and consumer awareness**, and **not to allege any irregularity or wrongdoing** on the part of IEMOP or any WESM participant. Accurate disclosure of the above information will greatly assist in ensuring that discussions on market fees and electricity pricing are **fact-based and properly informed**.

This request is respectfully made pursuant to **Executive Order No. 2 (s. 2016)** on Freedom of Information, as the information sought consists of official records and data maintained by IEMOP in the performance of its mandate.

We would appreciate acknowledgment of this request and, if possible, the release of the requested information within the period prescribed under FOI rules, or advice on any applicable data-access procedures.

Thank you for your continued commitment to transparency and integrity in the operation of the Philippine electricity market.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Pete L. Ilagan', with a long horizontal line extending to the right.

**PETRONILO "PETE" L. ILAGAN**  
President



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President and CEO

Independent Electricity Market Operator of the Philippines

9th Floor, Robinsons Equitable Tower

ADB Avenue, Ortigas Center

Pasig City

**Subject: Request for WESM Price Data for Luzon, Visayas, and Mindanao (November–December 2025) and Clarification on Reported Price Movements**

**Dear Engr. Descanzo,**

Warm greetings.

We write in the interest of **consumer information and market transparency** to respectfully request official data and clarification regarding **Wholesale Electricity Spot Market (WESM) prices** for the months of **November and December 2025**, particularly for the **Luzon, Visayas, and Mindanao** grids.

Recent media reports have indicated **elevated and volatile WESM prices** in certain periods during these months, especially in the Visayas and Mindanao. In light of the direct impact of WESM prices on electricity charges passed on to captive consumers—particularly those served by Electric Cooperatives—we respectfully seek to **verify and better understand these reported market conditions** based on official IEMOP records.

Specifically, we respectfully request the following information:

- Official WESM price data** for Luzon, Visayas, and Mindanao for **November and December 2025**, including:
  - Monthly average prices (P/kWh);

Independent Electricity Market Operator of the Philippines, inc.  
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- b. Monthly peak prices (P/kWh); and
  - c. Identification of dates or trading intervals with unusually high price levels, if available.
2. **Any market notices, advisories, or reports** issued by IEMOP during the same period that relate to:
- a. supply-demand imbalances,
  - b. outages or deratings,
  - c. congestion or system constraints, or
  - d. other factors affecting WESM price behavior.
3. A **general explanation**, at a high level, of the **principal factors** that contributed to the reported price movements during November and December 2025, particularly in the Visayas and Mindanao grids, based on IEMOP's market monitoring and operational assessments.

We emphasize that this request is made **solely for purposes of consumer awareness, policy discussion, and informed public discourse**, and **not to attribute fault or liability** to any market participant. Accurate and official information from IEMOP is essential to ensure that discussions on electricity prices and consumer impacts are **fact-based and properly contextualized**.

This request is respectfully made pursuant to **Executive Order No. 2 (s. 2016)** on Freedom of Information, as the data requested consist of official records and market information within the custody or control of IEMOP.

We would appreciate acknowledgment of this request and, if possible, the release of the requested information within the period provided under the FOI rules, or advice on any applicable extension or data access procedure.

Thank you for your continued role in ensuring transparency and integrity in the operation of the electricity market. We look forward to your response.

Very truly yours,



**PETRONILO "PETE" L. ILAGAN**  
President