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21 January 2026

**THE HONORABLE ERC CHAIRPERSON AND COMMISSIONERS**

Energy Regulatory Commission  
Exquadra Tower, Jade Drive  
San Antonio, Pasig City

**ATTY. FRANCIS SATURNINO JUAN**  
Chairperson and CEO

**ATTY. FLORESINDA BALDO-DIGAL**  
Commissioner

**MARKO ROMEO FUENTES**  
Commissioner

**ATTY. AMANTE A. LIBERATO**  
Commissioner

**ATTY. PARIS G. REAL**  
Commissioner



*Rheilyn F. Orijuela*  
RHEILYN F. ORIJUELA

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**Thru:** Hon. Alvin Jones M. Ortega  
Acting Director  
Regulatory Operations Services

**Subject:** Standardization of Monthly Billing Format of Distribution Utilities

**Dear Honorable Chairperson and Commissioners:**

We respectfully acknowledge the Commission's letter dated **13 August 2025**, issued in response to our request for the Commission's intervention in the standardization of the monthly billing format of distribution utilities (DUs), particularly with respect to clarity, durability, and consumer-friendliness.

We further acknowledge the subsequent **email reply dated 20 January 2026**, informing us of the Commission's ongoing work on a proposed Amended Bill Format, and its intended incorporation into the proposed amendments to ERC Resolution No. 14, Series of 2022 (Uniform Rate Reduction or URR Rules), which will be subject to public consultation.

At the outset, we respectfully note that while the Commission cited **recent Bureau of Internal Revenue (BIR) issuances** in its 13 August 2025 reply, and **ERC Resolution No. 14, Series of 2022 (URR Rules)** in the 20 January 2026 email, copies of these cited regulatory instruments were not furnished to NASECORE. Access to these documents is essential for stakeholders to meaningfully understand the regulatory bases invoked and to prepare informed and constructive inputs, particularly in anticipation of the forthcoming public consultation.

While we recognize that BIR issuances may affect certain content and disclosure requirements of billing statements, we respectfully emphasize that our concern extends beyond layout compliance or tax-related disclosures. Our submission is anchored on a more fundamental consumer-protection issue: **paper size, paper quality, and print durability**.

For more than a decade, many electric cooperatives and some distribution utilities have shifted to **thin, thermal-type billing paper**, similar to retail receipts, where printed figures and billing details **fade over time**. This practice has materially impaired consumers' ability to:

- retain electricity bills as reliable records for filing, audits, and dispute resolution;
- present documentary proof for complaints, adjustments, refunds, or administrative and judicial proceedings; and
- comply with record-keeping requirements imposed by government agencies and courts.

In contrast, MERALCO, as the country's largest distribution utility, has consistently maintained a billing format using durable paper and readable print that remains legible over time. This demonstrates that adopting a consumer-protective standard is both feasible and practicable, and not unduly burdensome.

We respectfully acknowledge that one possible rationale for the change in paper size, paper quality, and print durability adopted by many electric cooperatives may have been **cost reduction**. However, this justification is untenable in a regulated environment. The cost of billing and customer service including the printing and distribution of monthly bills is already part of the annual revenue requirement approved by the Commission. Any material change in billing practices purportedly undertaken to reduce costs should therefore have been disclosed to, reviewed by, and approved by the Commission, especially where such changes adversely affect consumers' ability to retain bills as official records.

We respectfully recall that, in earlier years, there existed a **uniform or standard billing format** applicable to all distribution utilities, including electric cooperatives. In this light, we are constrained to raise a serious **institutional concern: how the widespread change in billing format and paper quality adopted by many electric cooperatives over the past ten (10) years or more may not have reached the Commission's attention, or prompted regulatory review, during that period.**

We raise this observation not in a confrontational sense, but in the interest of regulatory clarity, institutional accountability, and consumer protection. Billing statements are a primary consumer interface and a regulated instrument. Their gradual deterioration in durability and long-term legibility has had real and continuing consequences for consumers, yet the issue appears to have gained regulatory traction only after it was formally raised by a consumer organization such as NASECORE.

In this context, we respectfully seek clarification on the following related regulatory matters:

**Did electric cooperatives and other distribution utilities seek and obtain prior approval from the Commission when they changed their respective billing formats, particularly with respect to paper size, paper quality, and printing method?**

Further, in the event that such changes were implemented without prior ERC approval, we respectfully request clarification on the Commission's policy and regulatory position, including its corrective authority and intended regulatory response. Unilateral changes that diminish durability and long-term legibility raise serious concerns relating to consumer rights, transparency, and regulatory compliance.

Considering that there are now over 141 distribution utilities nationwide, including electric cooperatives, we respectfully reiterate our position that the establishment of a minimum national standard for monthly billing format covering not only content but also paper durability and long-term legibility is necessary in the interest of consumers, transparency, and regulatory fairness.

It bears emphasis that the 121 electric cooperatives, taken collectively, serve more than fifteen million (15,000,000) electricity consumers nationwide. As such, deficiencies in billing format, paper quality, and print durability are not isolated or minor inconveniences, but system-wide consumer-protection issues affecting a substantial segment of the population many of whom are located in rural and economically vulnerable areas where electricity bills often serve as primary official records for household, cooperative, and government transactions.

In view of the Commission's indication that the proposed Amended Bill Format will be taken up in connection with the amendments to the Uniform Rate Reduction

(URR) Rules, we respectfully submit that this linkage be clearly understood in terms of implementation, disclosure, and transparency, and not as a recharacterization of billing format as a rate-setting or revenue issue.

The URR Rules govern rate adjustments, refunds, and the manner by which over-recoveries are returned to consumers. They are substantively concerned with rates and monetary computations, not with paper size, paper quality, print durability, or other physical attributes of billing materials.

Billing format becomes relevant to the URR framework only because URR adjustments are implemented and disclosed through the monthly bill, which is the sole document available to consumers to see, verify, retain, and rely upon as proof of such rate reductions and refunds. In this limited but critical context, the durability, legibility, and record-worthiness of the monthly bill directly affect consumers' ability to monitor compliance with URR and to protect their rights in the event of disputes.

Accordingly, while billing format is not inherently part of the URR's substantive rate-setting rules, the consumer-protection concerns raised herein particularly on paper durability and long-term legibility should be explicitly addressed and institutionalized in the forthcoming rules and billing standards.

We therefore respectfully request that, as the Commission finalizes the new billing format, it explicitly consider and incorporate standards on:

1. **minimum paper quality and size** suitable for long-term filing and record purposes; and
2. **printing methods that do not fade over time**, ensuring that electricity bills remain reliable official records.

If it can be established that electric cooperatives implemented changes in paper size, paper quality, and print durability without prior approval of the Commission, we respectfully submit that the Commission has the authority to direct the immediate reversion to the previously approved billing format using durable paper and legible print consistent with established practice, including that maintained by MERALCO, and to require its application beginning with the next billing cycle. Such corrective action would reaffirm that material changes in regulated consumer interfaces cannot be undertaken unilaterally without Commission oversight.

Further, where such unauthorized changes are established, the Commission may also consider, subject to due process, whether the responsible directors and officers of the concerned electric cooperatives should be held accountable in accordance with applicable laws, rules, and regulations. Effective regulation requires not only the setting of standards, but also the enforcement of accountability where deviations from approved practices are shown to have prejudiced consumers.

We trust that this matter will be treated not merely as a formatting issue, but as an important **consumer-protection and regulatory oversight concern**, consistent with the Commission's mandate to protect public interest.

Thank you for your continued engagement with consumer groups.

Very truly yours,



**PETRONILO L. ILAGAN**  
President

Copy furnished:

His Excellency, President Ferdinand R. Marcos Jr.  
Hon. Ralph Recto, Executive Secretary  
Hon. Vicente "Tito" Sotto, Senate President  
Hon. Faustino "Bojie" Dy III, Speaker of the House of Representatives  
Hon. Sharon S. Garin, Secretary, Department of Energy