

Republic of the Philippines
ENERGY REGULATORY COMMISSION
San Miguel Avenue, Pasig City



**IN THE MATTER OF THE
APPLICATION FOR
APPROVAL OF THE
ANCILLARY SERVICES
PROCUREMENT
AGREEMENT (ASPA)
BETWEEN THE NATIONAL
TRANSMISSION
CORPORATION (TRANSCO)
NOW NATIONAL GRID
CORPORATION OF THE
PHILIPPINES (NGCP) AND
THE NATIONAL POWER
CORPORATION (NPC),
WITH PRAYER FOR
PROVISIONAL AUTHORITY**

ERC CASE NO. 2009-029 RC

**NATIONAL GRID
CORPORATION OF THE
PHILIPPINES (NGCP),
Applicant.**

X-----X

D O C K E T E D
Date: **MAY 20 2016**
By:

ORDER

THE CASE

Ancillary Services (AS) are services necessary to support the transmission of capacity and energy from resources to loads while maintaining reliable operation of the transmission system in accordance with the Philippine Grid Code.¹

For the Commission's determination is the proper amount that the National Power Corporation (NPC) can charge the National Grid Corporation of the Philippines (NGCP) for Ancillary Services (AS) it provided the latter during the 26 March 2008 to 25 October 2009 billing period.

¹ Section 4 (b), R.A. 9136 or the Electric Power Industry Reform Act (EPIRA) of 2001.

THE FACTUAL ANTECEDENTS

The Commission issued an Order dated 09 March 2006 in ERC Case No. 2002-253² approving Applicant National Grid Corporation's (NGCP) predecessor, National Transmission Corporation's (TransCo) proposed Ancillary Services Procurement Plan (ASPP). In the same Order, the Commission directed TransCo to file a separate application for the approval of the corresponding Ancillary Services – Cost Recovery Mechanism (AS-CRM).

Consequently, on 03 October 2007, the Commission issued a Decision in ERC Case No. 2006-049 RC³ approving TransCo's AS-CRM subject to the following conditions:

- a) The cost of procuring the Ancillary Services under the ASPP should be recovered one hundred percent (100%) from load customers, but only until such time that the Ancillary Services are traded in the Wholesale Electricity Spot Market (WESM); and
- b) All contracts for the procurement of Ancillary Services shall be submitted to the Commission for approval.

On 29 September 2008, in line with the ASPP and the AS-CRM, TransCo entered into an Ancillary Services Procurement Agreement (ASPA) with the National Power Corporation (NPC). Subsequently, pursuant to Section 21, of R.A. 9136 or the Electric Power Industry Reform Act (EPIRA) of 2001, TransCo assigned its rights over the ASPA to its concessionaire, herein Applicant NGCP.

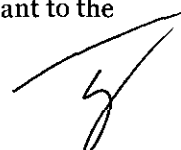
Prior to the execution of the ASPA, NPC has been providing Ancillary Services to the Luzon, Visayas, and Mindanao Grids based on rates approved by the Commission in an Order dated 20 September 2002 in ERC Case No. 2001-9014.

Subsequently, on 20 May 2009, NGCP filed the instant Application seeking the Commission's approval of its ASPA with NPC. On 15 July 2009, the Power Sector Assets and Liabilities Management

² Entitled "Application for the Approval of the Proposed Rules, Terms and Conditions for Open Access Transmission Service (OATS) and Proposed Rates, Terms and Conditions of Ancillary Services."

³ Entitled "In The Matter of the Application for the Approval of the Ancillary Services-Cost Recovery Mechanism (AS-CRM) Of the Ancillary Services Procurement Plan (ASPP) With Prayer for Provisional Authority."

⁴ In the Matter of the Application for the Approval of the Unbundled Rates Pursuant to the Provisions of Republic Act No. 9136.



Corporation (PSALM) filed a Petition for Intervention MANIFESTING that pursuant to Section 49 of EPIRA it is now the owner of all existing NPC generation assets which provide Ancillary Services to NGCP, and thus it has substantial interest in the case.

On 12 October 2009, the Commission issued a provisional authority and allowed NPC to charge NGCP for Ancillary Services, as follows:

GRID	LUZON	VISAYAS	MINDANAO
*RR, CR, AND DR, PHP/KW PER HOUR	1.1805	1.7368	1.3044
REACTIVE POWER SUPPORT, PHP/MVAR/MO.	38.40	17.33	21.25

*Regulating Reserve, Contingency Reserve, and Dispatchable Reserve

On 02 March 2010, the Commission issued a Decision making the provisional authority permanent. In the said Decision, the Commission also required that the rate for Reactive Power Support be changed from PhP/mVar per month to PhP/mVar per hour, in order for it to be consistent with the ASPP approved by the Commission in ERC Case No. 2002-253.

The Dispositive portion of the Decision reads:

WHEREFORE, the foregoing premises considered, the application for approval of the Ancillary Services Procurement Agreement (ASPA) executed between the National Transmission Corporation [now National Grid Corporation of the Philippines (NGCP)] and the National Power Corporation (NPC) filed by NGCP is APPROVED WITH MODIFICATION. Accordingly, the provisionally-approved ASPA be made permanent subject to the following conditions:

NPC Ancillary Service rates shall be as follows:

GRID	LUZON	VISAYAS	MINDANAO
*RR, CR and DR, PhP/kW per hour	1.1805	1.7368	1.3044
Reactive Power Support, PhP/mVar/hour	0.0533	0.0241	0.0295

*RR-Regulating Reserve, CR-Contingency Reserve, and DR-Dispatchable Reserve

The above rates shall, likewise, be applicable under Clause 6.2 should the plants covered by the ASPA be scheduled and dispatched but were not nominated due to technical and/or economic constraints including other related causes and under Clause 6.3 should any plants not covered by the ASPA be scheduled and dispatched.

NGCP is hereby directed to:

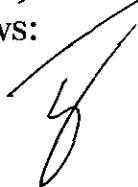
- i. Schedule a mix of hourly capacity at least cost for ancillary services needed to maintain power quality, security, reliability and integrity of the grid; and
- ii. Submit its monthly computation of the ancillary service rates it passes-on to its customers, including the necessary documents for the verification of the amounts considered in the computation. This should be submitted with the reportorial requirements on the ASPP and AS-CRM.

SO ORDERED.

The Commission ruled therein that NPC should be allowed to recover Ancillary Services charges in PhP/kWh beginning only from the April 2008 Billing Period until the grant of provisional authority or the period from 26 March 2008 to 25 October 2009.

Accordingly, NPC and NGCP were directed to submit for the Commission's approval the recoverable amount of AS Charge and the corresponding collection scheme to be implemented. NPC and Applicant NGCP subsequently filed separate compliances to the aforementioned Decision.

In its "Compliance with Manifestation" filed on 07 May 2010 NPC submitted the amount of Six Billion Forty Eight Million Two Hundred Seventy-Six Thousand Seven Hundred Seven Pesos (PhP6,048,276,707.00) as total Ancillary Services (AS) Charge, broken down as follows:



PARTICULARS	PHP
AS Differential	5,283,824,999.51
VAT	217,959,060.75
Interest	546,492,646.74
Total	6,048,276,707.00

As can be gleaned from the above table, NPC included interest and Value Added Tax (VAT) in computing its total AS Differential recoverable from Applicant NGCP. The interest rate used by NPC was based on the non-prime lending rate of Landbank of the Philippines (LBP) or Philippine National Bank (PNB) whichever is higher, pursuant to the provisions of the ASPA⁵.

NPC likewise stated in its Compliance that it was still awaiting NGCP's proposed mechanism for the recovery of the aforesaid amount. Moreover, NPC stated that it intends to be further compensated for additional interest charges should NGCP propose a staggered recovery mechanism from its load customers and consequently, implement a staggered payment mechanism to NPC.

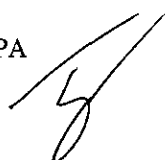
On 30 November 2010, NGCP filed its "Manifestation with Motion for Clarification." Therein, NGCP manifested that it was of the understanding that the Commission's Decision dated 02 March 2010 directed both NPC and NGCP to file a joint submission of the recoverable amount and collection scheme, and not separate submissions. In the same Manifestation, NGCP nonetheless submitted the amount of AS Charge based on its own computation.

NGCP further explained that it computed the amount based on the total scheduled capacity in kW, of NPC's plants. The said schedule is consistent with the actual AS billing data of TransCo and NGCP.

The following table shows the different amounts submitted separately by NPC and NGCP representing the AS Charges.

	AS DIFFERENTIAL	VAT	INTEREST	TOTAL
NPC	5,283,824,999.51	217,959,060.75	546,492,646.74	6,048,276,707.00
NGCP	5,286,853,359.62	-	-	5,286,853,359.62
Difference	(3,028,360.11)	217,959,060.75	546,492,646.74	761,423,347.38

⁵ Section 9 of the September 29, 2008 ASPA



Based on the foregoing submission of NGCP, NPC recalculated its Ancillary Service charges and submitted the new figures to the Commission through a "Manifestation and Motion" dated 06 June 2011. NPC's recomputation resulted in the amount of Six Billion, Eight Hundred Eighty Eight Million, Sixty Five Thousand, Nine Hundred Twenty Two Pesos and One Centavo (PhP6,888,065,922.01), broken down as follows:

GRID	AS DIFFERENTIAL	VAT	INTEREST	TOTAL
Luzon	1,510,682,053.65	54,317,044.32	405,085,815.43	1,970,084,913.40
Visayas	1,924,686,069.35	75,365,972.71	488,960,876.46	2,489,012,918.52
Mindanao	1,851,485,236.61	88,442,218.15	489,040,635.33	2,428,967,990.09
Total	5,286,853,359.62	218,125,235.18	1,383,087,327.22	6,888,065,922.01

On 11 January 2012, NPC filed a "Motion to Resolve" seeking the Commission's resolution of its "Manifestation and Motion."

On 01 March 2016, Intervenor PSALM filed a "Motion to Approve the Recoverable Ancillary Services Differential and Collection Scheme" asking that the amount of Five Billion Two Hundred Eighty Six Million Eight Hundred Fifty-Three Thousand Three Hundred Fifty-Nine Pesos, and Sixty Two Centavos (PhP 5,286,853,359.62) plus applicable interest and VAT be approved by the Commission.

THE DISCUSSION

In view of the conflicting submissions by NPC and NGCP the Commission deems it proper to resolve the following matters: the proper amount of Ancillary Services (AS) Charge, the propriety of imposing interest charges and VAT, the recovery period to which the amount will be applied, and the rate impact of the amount to be imposed.

- I. NGCP AND NPC'S RECONCILED FIGURES IS THE PROPER FIGURE REPRESENTING THE PRINCIPAL AMOUNT OF THE ANCILLARY SERVICES (AS) CHARGE.**



Pursuant to the 02 March 2010 Decision issued by the Commission, NPC and NGCP were required to submit the recoverable amount representing the AS Differential for the billing period 26 March 2008 to 25 October 2009. However, as earlier discussed, NPC and NGCP failed to reconcile their respective computations of the AS Charge.

The Commission noted that the differences between the two amounts submitted are rooted in the inclusion by NPC of Value Added Tax (VAT) as well as chargeable interest in the computation of the amount of AS Differential. Initially, there was also a variance in the amount due to changes in rates. The difference was however resolved and the amounts were reconciled in the 06 June 2011 submission of NPC. Therein, NPC manifested that it was adopting the same computation made by NGCP.

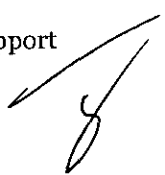
Likewise, in its "Motion to Resolve" filed on 27 May 2011, NPC reiterated that its total recoverable amount of PhP5,286,853,359.62 representing the AS differential excluding VAT and interest corresponds to the same amount submitted by NGCP. Consequently, there is no more issue to thresh out as regards the principal amount for AS charges. The only issue left for the Commission to resolve is the propriety of the inclusion of VAT and interest in the computation.

The following table shows the detailed computation of the AS differential:

AS RATES ⁶	LUZON	VISAYAS	MINDANAO
ERC-approved rate	1.1805	1.7368	1.3044
TransCo/NGCP's rate	0.9418	0.4212	0.5230
Differential Rates	0.2387	1.3156	0.7814
BILLING DETERMINANT ⁷	LUZON	VISAYAS	MINDANAO
Regulating Reserve	1,402,589,500	191,010,735	299,814,786
Contingency Reserve	1,857,116,000	839,212,853	1,126,428,818
Dispatchable Reserve	3,069,084,000	432,748,493	943,202,565
TOTAL	6,328,789,500	1,462,972,081	2,369,446,169
AS DIFFERENTIAL	LUZON	VISAYAS	MINDANAO

⁶ Uniform rate for the following AS: Regulating Reserve, Contingency Reserve, and Dispatchable Reserve

⁷ No provision of Reactive Power Support



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Regulating Reserve	334,798,113.65	251,293,722.97	234,275,273.78
Contingency Reserve	443,293,589.20	1,104,068,429.41	880,191,478.39
Dispatchable Reserve	732,590,350.80	569,323,917.39	737,018,484.29
TOTAL	1,510,682,053.65	1,924,686,069.76	1,851,485,236.46
GRAND TOTAL ⁸			5,286,853,359.87

The AS differential rate used above is based on the difference between the Commission's approved rates and the rates used per Statement of Account (SOA). On the other hand, the billing determinant used above is based on the total scheduled capacity, in kW, of NPC plants and the same is consistent with the actual AS billing data of Transco and NGCP.

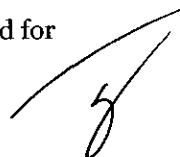
Thus, the Commission has determined that the proper principal amount of AS Differential exclusive of VAT and interest is Five Billion Two Hundred Eighty Six Million Eight Hundred Fifty-Three Thousand Three Hundred Fifty-Nine Pesos and Sixty Two Centavos (PhP5,286,853,359.62).

II. VAT IS A MERE SURCHARGE AND IS PAYABLE TO NPC ONLY AFTER THE SAME HAS BEEN COLLECTED BY NGCP FROM ITS CUSTOMERS.

NPC has consistently included Value Added Tax (VAT) in its computation for the total AS Charge. It computed the VAT based on the generation mix of NPC plants that provided Ancillary Services to Applicant NGCP. NPC thus arrived at the amount of Two Hundred Eighteen Million One Hundred Twenty Five Thousand Two Hundred Thirty Five Pesos And Eighteen Centavos (PhP218,125,235.18).

In its Manifestation dated 30 November 2010 NGCP argued that it did not include VAT in its computation as the same is a mere surcharge in its power bill. NGCP further asserted that the inclusion of the VAT amount in the computation of AS Charge is premature as it could only pay NPC the said amount once the same has been fully collected from its customers.

⁸ Computed value higher than PhPo.25 as compared to the amount prayed for (PhP5,286,853,359.62) due to rounding off difference



The Commission recognizes that VAT is a legitimate charge that must be accounted for in the overall cost for providing Ancillary Services. However, the Commission finds merit in NGCP's arguments that given the nature of VAT as a surcharge in the power bill, the same should be remitted to NPC only after it has been collected by NGCP from its customers. Consequently, VAT should be excluded in the computation of the total AS Differential subject of the instant case.

In order that NPC, NGCP, and the consuming public in general may be guided, the Commission deemed it proper to provide the applicable generation mix to use in the charging/billing of the applicable VAT. The following table shows the generation mix of the plants that provided the AS during the covered billing periods:

GRID	NON-VATABLE	VATABLE	TOTAL
Luzon	69.97%	30.03%	100.00%
Visayas	67.37%	32.63%	100.00%
Mindanao	60.19%	39.81%	100.00%

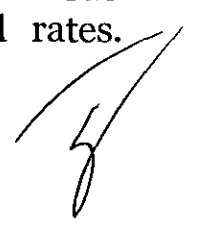
NGCP should use the above data as reference in computing the applicable VAT to be billed to its customers. Thereafter, the amount collected should be remitted to NPC in accordance with the ASPA.

III. THE INTEREST CHARGES IMPOSED BY NPC ARE IMPROPER.

The figures that NPC submitted to the Commission likewise included interest charges. NPC imposed a twelve percent (12%) interest charge covering the period that the amount became outstanding. In the event that Applicant NGCP recovers the AS Differential from its customers in a staggered basis, NPC likewise proposed to impose additional interest.

The period when the amount became outstanding pertains to the time when the amount became due, which is the day of the following month of the Billing cut-off, up to 28 February 2011.

In its Manifestation dated 30 November 2010 NGCP forwarded its position that interest rates should not be imposed since the Commission's directive in its original Decision dated 02 March 2010 was to submit a recoverable amount using the approved rates.



Accordingly, NGCP reasoned that until the Commission has resolved the varying figures submitted by NPC and NGCP, the AS Charge should not yet be subject to surcharge or interest.

Furthermore, NGCP prayed that, in the event that the Commission allows the imposition of interest, the same should be part of the recovery amount; and the billing and collection scheme incorporating the same should be consistent with the principle of Revenue Neutrality.

By way of recapitulation, the Decision dated 02 March 2010, the imposition of AS Charge should retroact to the April 2008 Billing Period. The parties were likewise directed to submit the unrecovered AS Charge during this period for the approval of the Commission, to wit:

6. BILLING ISSUES FROM THE EFFECTIVITY OF THE AS-CRM UNTIL THE ISSUANCE OF THE PROVISIONAL AUTHORITY

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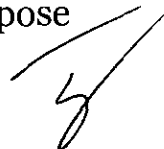
Thus, NPC should only be allowed to recover ancillary service rates approved herein in PhP/kW/hr beginning April 2008 until the issuance of the provisional authority for the actual capacity it provided to NGCP/ Accordingly, NPC and NGCP are hereby directed to submit the recoverable amount and collection Scheme from NGCP's customer for the approval of the Commission.

xxx

It is clear from the foregoing that interest charges should not be imposed since no late payment was incurred by NGCP as the final amount is still subject to the Commission's approval.

The Commission likewise noted that NPC imposed an interest on the principal amount of AS Charge plus VAT. The Commission disallows this imposition. VAT is a mere pass-on charge that becomes demandable only upon collection from the customers. NPC should not be allowed to earn from its collection of VAT.

In the event that NGCP recovers the AS Charge from its customers in a staggered basis, NPC likewise proposed to impose



interest charges. In its Manifestation, NGCP argued that the implementation of a staggered recovery scheme is still subject to the approval of the Commission. However, NGCP forwarded the position that the staggered amounts should be treated as deferred billings which should be included in the Ancillary Service Power Bill to be issued by NPC to NGCP.

The Commission finds merit in NGCP's arguments. The staggered amounts are in the nature of deferred billings. Pursuant to the ASPA subject of the instant case, these amounts should be included in the Bill to be issued by NPC to NGCP. Consequently, the deferred payments should be treated in the same manner as other amounts which fall due under the Bill. Thus, only the late payments on the amounts stated therein may be subject to interest charge.

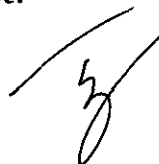
The Commission has thus determined that the proper total amount of AS Differential is Five Billion Two Hundred Eighty Six Million Eight Hundred Fifty-Three Thousand Three Hundred Fifty-Nine Pesos and Sixty Two Centavos (PhP5,286,853,359.62) plus the applicable VAT.

**IV. THE RECOVERY PERIOD
SHOULD BE EXTENDED
TO MINIMISE THE RATE
IMPACT.**

In its Manifestation dated 30 November 2010, NGCP also proposed a recovery scheme for the AS Charge which would minimize the possible rate impact in billing the recoverable AS Charge to customers in the Luzon, Visayas, and Mindanao grids:

GRID	BILLING AND COLLECTION PERIOD (MONTH)
Luzon	1
Visayas	6
Mindanao	6

As can be gleaned from NGCP's proposal, the period within which NGCP will recover the AS Charge in Luzon is one (1) month. On the other hand, NGCP will spread the collection of the AS Charge on its customers in the Visayas and Mindanao within a period of six (6) months in order to mitigate the rate impact.



NGCP also submitted its estimated rate impact in Php/kWh-month using the lowest billing determinant for 2010 as shown below:

GRID	BILLING AND COLLECTION PERIOD (MONTH)	PHP/KW-MONTH
Luzon	1	210.20
Visayas	6	248.07
Mindanao	6	223.83

The Commission took note of Applicant NGCP's proposal and subsequently derived a simulation of estimated actual Php/kW charge that NGCP collects from its customers. The simulation was based on NGCP's forecasted demand and energy for CY 2016:

PARTICULARS	LUZON	VISAYAS	MINDANAO
Annual kW demand	106,513,920	18,384,980	20,016,100
Annual kWh	55,182,390,000	8,537,780,000	9,531,830,000

The proper recovery period within which NGCP should impose the AS Differential to its customers is as follows: six (6) months for the Luzon Grid; thirty-six (36) months for the Visayas and Mindanao Grids. This scheme is designed to mitigate the rate impact of the AS Differential to Applicant NGCP's customers.

Further, a uniform rate for all grids must be implemented in recovering the AS Differential amount. The said uniform rate to be charged by Applicant NGCP is Php 31.38/ kw/ month, with an estimated rate impact of 6.5 centavos/ kWh to the end user.

IN VIEW OF THE FOREGOING, the Commission APPROVES the recovery of the Differential Charge for the Ancillary Service provided by the National Power Corporation (NPC) to the National Grid Corporation of the Philippines (NGCP) representing the 26 March 2008 to 25 October 2009 billing period, subject to the following conditions:

- a. Ancillary Service (AS) Differential per Grid:

GRID	AMOUNT (PHP)
Luzon	1,510,682,053.65
Visayas	1,924,686,069.35
Mindanao	1,851,485,236.62


- b. Applicant NGCP should bill a uniform rate of PhP31.38/kW-month as Ancillary Service Differential for the Luzon, Visayas, and Mindanao grids until such time that the full amount shall have been collected, which would have an estimated rate impact of 6.5 centavos/kWh to end-users;
- c. Applicant NGCP should charge the applicable Value Added Tax (VAT) on the AS Differential based on the following generation mix:

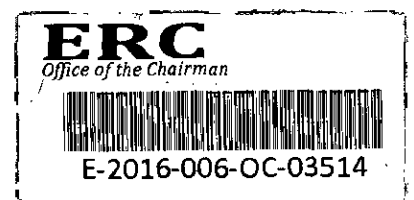
GRID	NON-VATABLE	VATABLE
Luzon	69.97%	30.03%
Visayas	67.37%	32.63%
Mindanao	60.19%	39.81%

- d. The above ancillary service differential should be passed on to its customers in accordance with the approved "Ancillary Services-Cost Recovery Mechanism" (AS-CRM).

SO ORDERED.

Pasig City, 15 March 2016.


JOSE VICENTE B. SALAZAR
Chairman and CEO




ALFREDO J. NON
Commissioner


GLORIA VICTORIA C. YAP-TARUC
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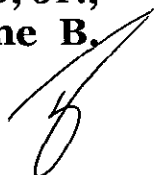
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