

Item No.: 13

Date: 29 2024 MA

REPUBLIC OF THE PHILIPPINES
ENERGY REGULATORY COMMISSION
JADE DRIVE, PASIG CITY



IN THE MATTER OF THE APPLICATION FOR APPROVAL OF THE EMERGENCY POWER SUPPLY AGREEMENT BETWEEN ENERGY DEVELOPMENT CORPORATION AND DON ORESTES ROMUALDEZ ELECTRIC COOPERATIVE, INC., WITH MOTION FOR CONFIDENTIAL TREATMENT OF INFORMATION,

ERC CASE NO. 2024-008 RC

ENERGY DEVELOPMENT CORPORATION (EDC) AND DON ORESTES ROMUALDEZ ELECTRIC COOPERATIVE, INC. (DORELCO),

Applicants.

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JOINT PRE-TRIAL BRIEF

Applicants **ENERGY DEVELOPMENT CORPORATION (“EDC”) AND DON ORESTES ROMUALDEZ ELECTRIC COOPERATIVE, INC. (“DORELCO”)**, by and through their respective undersigned counsels, and unto this Honorable Commission, respectfully submit the following Joint Pre-Trial Brief in connection with the above captioned application:

I.

PROPOSED STIPULATION OF FACTS

Applicants proposes the following stipulations by the parties:

1. Applicant DORELCO is an electric cooperative duly organized and existing under and by virtue of the laws of the Philippines, with principal

office at Barangay San Roque, Tolosa, Leyte, Philippines. It is the exclusive franchise holder to own and operate a system for the distribution of electricity in the Municipalities of Tolosa, Tanauan, Dagami, Tabon-Tabon, Burauen, Julita, Lapaz, Dulag, Mayorga, Macarthur, Javier, Abuyog, and Mahaplag, all in the Province of Leyte.

2. Applicant EDC is a generation company duly organized, incorporated and registered under and by virtue of the laws of the Philippines, with principal office at Rockwell Business Center Tower 3, Ortigas Avenue, Pasig City. It owns and operates the approximately 592.33 MW Unified Leyte Geothermal Power Plant located in the Ormoc City and Kananga, Leyte.

3. DORELCO is in immediate need of 2MW contracted capacity for for around 1 year. To maintain an uninterrupted and reliable power supply due to a high level of supply deficit of at least 2MW, DORELCO decided to source the needed power at affordable and cheaper generation rates to help minimize the exposure to the volatile Wholesale Electricity Spot Market (“WESM”) prices.

4. Pursuant to Department of Energy (“DOE”) Department Circular 2018-02-003, as amended by DC 2021-09-0030, DORELCO is allowed to enter into a negotiated procurement of emergency electric power supply agreements with a generation company for a period not exceeding one (1) year, subject to such terms and conditions provided under Section 2.2.1.2 of DC 2021-09-0030.

5. DORELCO wrote to the DOE requesting for the issuance of Certificate of Exemption for a negotiated procurement of 2MW emergency power supply from EDC. The Letter expressed DORELCO’s urgent need for supply of electricity due to circumstances beyond the control of DORELCO, and the limited time to conduct the said Competitive Selection Process (“CSP”).

6. On 31 August 2022, DOE issued Certificate of Exemption No. COE-CSP-2022-08-038 in response DORELCO’s letter-request exempting it from the conduct of CSP for the procurement of emergency electric power supply.

7. In view of DORELCO’s supply deficit of at least 2MW for the period of 26 August 2022 to 25 August 2023, based on its Supply-Demand Scenario, and to protect its consumers from high electricity prices, DORELCO solicited for emergency power supply for one (1) year.

8. In response to DORELCO’s demand, EDC has offered to supply a portion of the emergency electric power supply requirements of DORELCO at a rate equivalent to or lower than the ERC-approved generation tariff for the same or similar technology in comparable areas and DORELCO accepted the

offer of EDC. Applicants executed the subject Emergency Power Supply Agreement (“EPSA”) for the supply of 2MW to DORELCO.

II.

ISSUES TO BE RESOLVED

- i. Whether the Honorable Commission should treat Annexes “T”, “S”, “T”, “U”, “V”, and “W” as confidential in perpetuity, directing their non-disclosure to persons other than the officers and staff of the Honorable Commission, perpetually protecting the said information from public disclosure by maintaining the same separate and apart from the records of the case, and ensuring that these are not divulged to unauthorized persons, pursuant to Rule 4 of its Rules of Practice and Procedure; and
- ii. Whether the Honorable Commission, after hearing on the merits, approve the Joint Application and EPSA between EDC and DORELCO, including all the rates, fees, charges, and tariff adjustment mechanisms set out therein at the rates provided in the EPSA, and authorizing DORELCO to charge and collect such rates, fees, charges, and tariff adjustments therein from its customers reckoned from the start of the supply by EDC to DORELCO under the EPSA.

III.

DOCUMENTS TO BE PRESENTED

9. Applicants will present the following documentary evidence as part of the testimonies of Applicants’ witnesses, as evidence in support of the Joint Application, and for the purposes indicated below:

EXH.	PARTICULARS	PURPOSE
A	Articles of Incorporation and By-laws of DORELCO	To show the following: a) DORELCO's legal personality and capacity in contracting the obligations under the EPSA; and b) Compliance with the ERC's documentary requirements in filing the Joint Application.
B	List of Board of Directors and Board Members and related ultimate parent company, subsidiaries, and affiliates of DORELCO	
B-1	Board Resolution on Authorized Representative of DORELCO	
B-2	Board Resolution on counsel of DORELCO	
C	Certificate of Incorporation of EDC and other relevant past Articles of Incorporation and By-laws	To show the following: a) EDC's legal personality and capacity in contracting the obligations under the EPSA; and b) Compliance with the ERC's documentary requirements in filing the Joint Application.
C-1	Latest Amended Articles of Incorporation of EDC	
C-2	Latest Amended By-laws of EDC	
D	General Information Sheet of EDC	
D-1	Secretary's Certificate of EDC	
D-2	Special Power of Attorney of EDC	
E	Board of Investments Certificate of Registration	To show the following: a) that EDC is a holder of Certificate of Registration from BOI for its Power Plant; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
F	Environmental Compliance Certificate	To show the following: a) that the DENR issued an ECC for EDC's Power Plant; and b) compliance with the ERC's documentary requirements in filing the Joint Application.

G-series	Certificate of Compliance (“COC”) or Provisional Authority to Operate (“PAO”)	To show the following: a) that ERC issued a COC and/or PAO to EDC; and b) compliance with the ERC’s documentary requirements in filing the Joint Application.
H-series	DOE Certificates of Endorsement (“COE”)	To show the following: a) that DOE issued COE to EDC; and b) compliance with the ERC’s documentary requirements in filing the Joint Application.
I*	Renewable Energy Service Contract	To show EDC’s compliance with the ERC’s documentary requirements in filing the Joint Application.
J	Certificate of Registration or Certificate of Commerciality	
K	Rate Impact	To show the following: a) the Rate Impact of the EPSA; and b) compliance with the ERC’s documentary requirements in filing the Joint Application.
L	Single Line Diagram Connection	To show the following: a) DORELCO’s Single-Line Diagram Connection; and b) compliance with the ERC’s documentary requirements in filing the Joint Application.
M	Emergency Power Supply Agreement between DORELCO and EDC	To show the following: a) the existence and due

M-1	Letter of DORELCO and EDC clarifying items in the Emergency Power Supply Agreement	execution of the EPSA entered into by and between EDC and DORELCO, and to prove the terms and conditions thereof; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
N	DOE Certificate of Exemption	To show the following: a) that the DOE issued to DORELCO a Certificate of Exemption exempting it from the conduct of the Competitive Selection Process for negotiated procurement of the EPSA with EDC; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
N-1	Letters to or from DORELCO	
O	Verified Certification in relation to delivery of power in emergency circumstances	To show EDC's compliance with the ERC's documentary requirements in filing the Joint Application.
P	NGCP Letter on Service Agreements Certification	To show the following: a) DORELCO's Transmission Service Agreement with NGCP; b) compliance with the ERC's documentary requirements in filing the Joint Application.
P-1	Transmission Service Agreement between NGCP and DORELCO	
Q	Writeup on TSC	To show DORELCO's compliance with the ERC's documentary requirements in filing the Joint Application.

R	Executive Summary of EPSA	To show the following: a) summary of the terms of the EPSA between EDC and DORELCO; b) compliance with the ERC's documentary requirements in filing the Joint Application.
S*	Write up regarding Sources of Funds/Financial Plans, Generation Rate and Derivation, Cash Flow specifying breakdown of costs and expenses	To show the following: a) EDC's sources of funds, generation rate and derivation, cash flow, and procurement process; and relevant technical and economic characteristics of generation capacity installed capacity, dependable capacity, and outages; b) support the Payment Structure of the PSA; and c) compliance with the ERC's documentary requirements in filing the Joint Application.
T*	Excel computations regarding Sources of Funds/Financial Plans, Generation Rate and Derivation, Cash Flow specifying breakdown of costs and expenses	
U*	Bank Certifications	
V*	Sworn statement on fuel procurement	
W*	Relevant technical and economic characteristics of generation capacity	
X	Supply Demand Scenario	To show the following: a) DORELCO's Supply and Estimation of Potential for Reduction in Load; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
Y	Estimated Load of Qualified Contestable Customers under RCOA	
Z	Latest Audited Financial Statements	To show the following: a) EDC's latest audited financial statements; and b) compliance with the ERC's documentary requirements in filing the Joint Application.

AA	Certification of net heat rate	To show the following: a) EDC's net heat rate; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
BB	WESM Registration	To show the following: a) EDC's and DORELCO's WESM Registration; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
CC	Write-up on non-applicable items	To show the following: a) that certain documentary requirements are not applicable in the instant Joint Application; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
CC-1	DORELCO Write-up on Demand Side Management	
CC-2	EDC Sample OR	To show EDC's compliance with the ERC's documentary requirements in filing the Joint Application.
DD	Water Permit from NWRB	To show the following: a) EDC's Water Permit from the NWRB; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
EE	DORELCO's Reliability Indices	To show EDC's compliance with the ERC's documentary requirements in filing the Joint Application.

FF	PSPP and DDP	To show the following: a) DORELCO's PSPP and DDP; and b) compliance with the ERC's documentary requirements in filing the Joint Application.
GG	Affidavit of Service showing that a complete copy of the Application and its annexes were sent to the Office of the Mayor of Tolosa	To show compliance with ERC's pre-filing requirements
GG-1	Affidavit of Service showing that a complete copy of the Application and its annexes were sent to the Sangguniang Panlungsod of Tolosa	
GG-2	Affidavit of Service showing that a complete copy of the Application and its annexes were sent to the Office of the Governor of Leyte	
GG-3	Affidavit of Service showing that a complete copy of the Application and its annexes were sent to the Sangguniang Panlalawigan of Leyte	
HH	Certification from the Office of the Mayor of Pasig City showing receipt of the Application and its annexes	
HH-1	Certification from the Sangguniang Panlungsod of Pasig City showing receipt of the Application and its annexes	
HH-2	Certification from the Office of the Mayor of Ormoc City showing receipt of the Application and its annexes	
HH-3	Certification from the Sangguniang Panlungsod of Ormoc City showing receipt of the Application and its annexes	
HH-4	Certification from the Office of the Mayor of Kananga showing receipt of the Application and its annexes	

HH-5	Certification from the Sangguniang Bayan of Kananga showing receipt of the Application and its annexes	
HH-6	Certification from the Office of the Governor of Leyte showing receipt of the Application and its annexes	
HH-7	Certification from the Sangguniang Panlalawigan of Leyte showing receipt of the Application and its annexes	
II	Affidavit of Publication showing that the Application was published in the December 4, 2023 issue of The Manila Times	
JJ	Complete copy of the December 4, 2023 issue of The Manila Times	
KK	Affidavit of Publication showing that the Notice of Virtual Hearing dated 5 March 2024 was published in the 13 March 2024 and 21 March 2024 issues of "Business Mirror"	To show compliance with the Order dated 5 March 2024
LL	Complete Copy of the 13 March 2024 issue of "Business Mirror"	
LL-1	The Notice of Virtual Hearing appearing in the 13 March 2024 issue of "Business Mirror"	
MM	Complete Copy of the 21 March 2024 issue of "Business Mirror"	
MM-1	The Notice of Virtual Hearing appearing in the 21 March 2024 issue of "Business Mirror"	
NN	Affidavit of Publication showing that the Notice of Virtual Hearing dated 5 March 2024 was published in the 13 March and 21 March 2024 issues of "The Manila Times"	
OO	Complete Copy of the 13 March 2024 issue of "The Manila Times"	

OO-1	The Notice of Virtual Hearing appearing in the 13 March 2024 issue of "The Manila Times"	
PP	Complete Copy of the 21 March 2024 issue of "The Manila Times"	
PP-1	The Notice of Virtual Hearing appearing in the 21 March 2024 issue of "The Manila Times"	
QQ	Affidavit of Service showing that copies of the Order and Notice of Virtual Hearing dated 5 March 2024 with a request for posting on their respective bulletin boards were sent to the Office of the Governor and the Sangguniang Panlalawigan of the Province of Leyte, the Office of the Mayor and the Sangguniang Bayans of Tolosa, Tanauan, Dagami, Tabon-Tabon, Burauen, Julita, Lapaz, Dulag, Mayorga, Macarthur, Javier, Abuyog, and Mahaplag	
RR	Certification from the Office of the Governor of Leyte showing that the Order and Notice of Virtual Hearing dated 5 March 2024, was posted on the provincial bulletin board of the Office of the Governor of Samar	
SS	Certification from the Sangguniang Panlalawigan of Leyte showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Panlalawigan of Leyte	
TT	Certification from the Office of the Mayor of Tolosa showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the bulletin board of the Office of the Mayor of Tolosa	

UU	Certification from the Sangguniang Bayan of Tolosa showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Tolosa	
VV	Certification from the Office of the Mayor of Tanauan showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Tanauan	
WW	Certification from the Sangguniang Bayan of Tanauan showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Tanauan	
XX	Certification from the Office of the Mayor of Dagami showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Dagami	
YY	Certification from the Sangguniang Bayan of Dagami showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Dagami	
ZZ	Certification from the Office of the Mayor of Tabon-Tabon showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Tabon-Tabon	
AAA	Certification from the Sangguniang Bayan of Tabon-Tabon showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Tabon-Tabon	

BBB	Certification from the Office of the Mayor of Burauen showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Burauen	
CCC	Certification from the Sangguniang Bayan of Burauen showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Burauen	
DDD	Certification from the Office of the Mayor of Julita showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Julita	
EEE	Certification from the Sangguniang Bayan of Julita showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Julita	
FFF	Certification from the Office of the Mayor of Lapaz showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Lapaz	
GGG	Certification from the Sangguniang Bayan of Lapaz showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Lapaz	
HHH	Certification from the Office of the Mayor of Mayorga showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Mayorga	

<p style="text-align: center;">III</p>	<p>Certification from the Sangguniang Bayan of Mayorga showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Mayorga</p>	
<p style="text-align: center;">JJJ</p>	<p>Certification from the Office of the Mayor of Macarthur showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Macarthur</p>	
<p style="text-align: center;">KKK</p>	<p>Certification from the Sangguniang Bayan of Macarthur showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Macarthur</p>	
<p style="text-align: center;">LLL</p>	<p>Certification from the Office of the Mayor of Javier showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Javier</p>	
<p style="text-align: center;">MMM</p>	<p>Certification from the Sangguniang Bayan of Javier showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Javier</p>	
<p style="text-align: center;">NNN</p>	<p>Certification from the Office of the Mayor of Abuyog showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Abuyog</p>	
<p style="text-align: center;">OOO</p>	<p>Certification from the Sangguniang Bayan of Abuyog showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Abuyog</p>	

PPP	Certification from the Office of the Mayor of Mahaplag showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Mahaplag	
QQQ	Certification from the Sangguniang Bayan of Mahaplag showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Mahaplag	
RRR	Affidavit of Service showing that copies of the Order and Notice of Virtual Hearing dated 5 March 2024 with a request for posting on their respective bulletins board were sent to the Office of the Governor and the Sangguniang Panlalawigan of the Province of Leyte, the Office of the Mayor and the Sangguniang Panlungsod of Ormoc City, and the Office of the Mayor and Sangguniang Bayan of Kananga	
SSS	Certification from the Office of the Mayor of Ormoc City showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the city bulletin board of the Office of the Mayor of Ormoc City	
TTT	Certification from the Sangguniang Panlungsod of Ormoc showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Panlungsod of Ormoc City	
UUU	Certification from the Office of the Mayor of Kananga showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the municipal bulletin board of the Office of the Mayor of Kananga	

VVV	Certification from the Sangguniang Bayan of Kananga showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Bayan of Kananga	
WWW	Affidavit of Service showing that copies of the Order and Notice of Virtual Hearing dated 5 March 2024 with a request for posting on their respective bulletins board were sent to the Office of the Mayor and the Sangguniang Panlungsod of Pasig City	
XXX	Certification from the Office of the Mayor of Pasig showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the city bulletin board of the Office of the Mayor of Pasig City	
YYY	Certification from the Sangguniang Panlungsod of Pasig showing that the Order and Notice of Virtual Hearing dated 5 March 2024 was posted on the Sangguniang bulletin board of the Sangguniang Panlungsod of Pasig City	
ZZZ	Affidavit of Posting from DORELCO showing that the Order and Notice of Virtual Hearing dated 5 March 2024 were posted at the company's website and Facebook page	To show a) compliance with the Order dated 5 March 2024; and b) the other means undertaken by the Applicants EDC and DORELCO to inform their consumers within their franchise area/area of the Joint Application, its reasons for filing, and the scheduled hearings.
AAAA	Affidavit of Posting from EDC showing that the Order and Notice of Virtual Hearing dated 5 March 2024 were posted at the company's website and Facebook page	

<p>BBBB to BBBB-3</p>	<p>Letters showing that a complete copy of the Application and the Order and Notice of Virtual Hearing dated 5 March 2024 were sent to and duly received by:</p> <ul style="list-style-type: none"> a) Office of the Solicitor General; b) Commission on Audit; c) Committee on Energy, House of Representatives; and d) Committee on Energy, Senate of the Philippines 	<p>To show a) compliance with the Order dated 5 March 2024; and b) that the i) Office of the Solicitor General; ii) Commission on Audit; iii) Committee on Energy of the House of Representatives; and iv) Committee on Energy of the Senate of the Philippines received a complete copy of the Application and the Order and Notice of Virtual Hearing dated 5 March 2024</p>
<p>CCCC</p>	<p>Affidavit of Posting from DORELCO showing that the Order and Notice of Virtual Hearing dated 5 March 2024, along with all jurisdictional requirements, were posted at the company's bulletin board</p>	<p>To show compliance with the Order dated 5 March 2024</p>
<p>DDDD</p>	<p>Affidavit of Posting from EDC showing that the Order and Notice of Virtual Hearing dated 5 March 2024, along with all jurisdictional requirements, were posted at the company's bulletin board</p>	

<p style="text-align: center;">EEEE</p>	<p>Judicial Affidavit of Engr. Melben T. Abrera</p>	<p>The testimony of the witness is being offered to prove the following:</p> <ul style="list-style-type: none"> a) The juridical personality of DORELCO/LEY ECO 1; b) The expiration of DORELCO's 5MW (baseload) Power Supply Agreement with Power Sector Assets and Managements (PSALM) on July 25, 2022; c) The exemption from the competitive selection process; d) The urgency to procure 2MW baseload to replaced the expired DORELCO's power supply agreement with PSALM; e) The circumstances leading to the execution of the Emergency Power Supply Agreement with EDC: f) The salient features of the emergency power supply agreement (EPSA); and
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		g) All other items in the emergency PSA which are relevant to its approval, and to identify documents.
EEEE-1	Signature of Engr. Melben T. Abrera	To authenticate Exhibit “EEEE”
FFFF	Judicial Affidavit of Mr. Bryan C. Carbajal	<p>The testimony of the witness is being offered for the following purposes:</p> <p>a) To testify on the allegations made in the Application, and that he participated in the preparation of the Application and some of the supporting documents;</p> <p>b) To identify the documentary evidence mentioned in his Affidavit in support of the Application; and</p> <p>c) To testify on the i) terms and conditions of the Emergency Power Supply Agreement (“EPSA”) entered into on 7 November 2022; ii) the basis of the tariff/ fees under the EPSA and how they are computed; iii) the technical specifications of the power plant.</p>
FFFF-1	Signature of Mr. Bryan C. Carbajal	To authenticate Exhibit “FFFF”

GGGG and GGGG-1	Hard copy of the expository presentations of EDC and DORELCO	To a) show Compliance with the Order dated 5 March 2024 and b) explain in simple terms to the Applicant's consumers and other concerned parties what the Application is all about
HHHH and HHHH-1	Soft copy of the expository presentations of EDC and DORELCO	

10. Applicants respectfully reserve the right to present additional documents, exhibits as shall become available for the purposes stated herein and/or for such other purposes necessary or proper in the course of trial or as the exigencies of the proceedings may require.

IV.

WITNESSES TO BE PRESENTED

A. Witness: Engr. Melben T. Abrera
Corporate Planning Department Manager
DORELCO

Gist of Testimony

1. To substantiate the material allegations in the Joint Application of EDC and DORELCO for the approval of the EPSA dated November 7, 2022, executed by EDC and DORELCO;
2. To testify on the estimated rate impact of the EPSA on the generation charges of DORELCO;
3. To prove the necessity and urgency of implementing the EPSA;
4. To identify the documentary evidence mentioned in her Affidavit in support of the Application; and
5. To substantiate other matters related and incidental thereto.

B. Witness: Bryan C. Carbajal
Power Marketing Officer
First Gen Energy Solutions – Affiliate of EDC

Gist of Testimony

1. To substantiate the material allegations in the Joint Application of EDC and DORELCO for the approval of the EPSA dated November 7, 2022, executed by EDC and DORELCO;
2. To testify on the estimated rate impact of the EPSA on the generation charges of DORELCO;
3. To prove the necessity and urgency of implementing the EPSA;
4. To identify the documentary evidence mentioned in her Affidavit in support of the Application; and
5. To substantiate other matters related and incidental thereto.

RESPECTFULLY SUBMITTED.

Leyte and Pasig City for Pasig City, 22 April 2024.

Counsel for DORELCO:



ATTY. ROGELIO P. GULA

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Roll of Attorneys No. 48025

PTR No. 8490302, Until December 31, 2024

Lifetime IBP No. 07688

MCLE Compliance No. VII-0004938

Valid until 14 April 2025

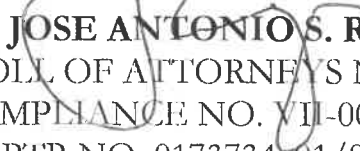
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By:



MIGUEL K. MATHAY
ROLL OF ATTORNEYS NO. 43982
MCLE COMPLIANCE NO. VI-0010308; 4/14/2022
PTR NO. 0173785; 01/02/2024
PASIG CITY
IBP NO. 302181; 01/08/2024
RIZAL (RSM)
email: mmathay@qmbti.com

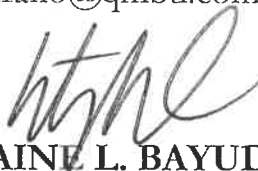
GIANNA MARIA C. COMSTI
ROLL OF ATTORNEYS NO. 63071
MCLE COMPLIANCE NO. VII-0015472; 4/14/2025
PTR NO. 0173730; 01/02/2024
PASIG CITY
IBP NO. 302158; 01/08/2024
RIZAL (RSM)
email: gcomsti@qmbti.com



JOSE ANTONIO S. REYES
ROLL OF ATTORNEYS NO. 62581
MCLE COMPLIANCE NO. VII-0011907; 4/14/2025
PTR NO. 0173734; 01/02/2024
PASIG CITY
IBP Lifetime No. 011794; RSM
email: jreyes@qmbti.com



REM JOSHUA T. SERRANO
ROLL OF ATTORNEYS NO. 77963
ADMITTED TO THE BAR ON MAY 11, 2022
PTR NO. 0173731; 01/02/2024
PASIG CITY
IBP NO. 302167; 01/08/2024
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BEATRIZ RAINE L. BAYUDAN
ROLL OF ATTORNEYS NO. 77792
ADMITTED TO THE BAR MAY 10, 2022
PTR NO. 0173728; 01/02/2024
PASIG CITY
IBP NO. 302166; 01/08/2024
RIZAL (RSM)
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JOHN MAVERICK G. ESPINOLA
ROLL OF ATTORNEYS NO. 81683
ADMITTED TO THE BAR MAY 24, 2022
PTR NO. 0173784; 01/02/2024
PASIG CITY
IBP NO. 302165; 01/08/2024
RIZAL (RSM)
email: mespinola@qmlaw.com.ph

EXPLANATION

Due to the volume of pleadings, motions, and other correspondence filed/sent by the Firm daily, the Firm is constrained to cause the service of the copy of the foregoing pleading to the other parties by registered mail/ordinary mail/private courier and/or electronic mail instead of by personal service.



JOHN MAVERICK G. ESPINOLA

Copy furnished:

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