

Matrix of Comments on the EMC Draft Rules

PROVISION	COMMENTS	ERC'S REMARKS
<p style="text-align: center;">GENERAL COMMENTS</p>	<p><u>RECA 1</u> Request that other DUs' practices on meter clustering or pole metering be exempted from the rules and not classified as EMC due to the ff.:</p> <ul style="list-style-type: none"> • Metering height is within the provisions of the PEC and the Magna Carta. Reading and emergency issues are within reach of any authorized personnel. • Most consumers where we install pole metering (clustering) are not informal settlers. In fact they secured their CFEI prior to service connection. • Pilferage is not rampant but we practice this on selected areas to prevent any possibility of such. <p><u>ABRECO</u> We implement pole metering with the consent of the consumers concerned. EMC may be applicable only to the capital town of Bangued (referring to Articles 2.2.1 & 2.2.2). Outside the urban area where consumers are fewer, Article 2.2.3 may be relevant as a modified version of the existing pole metering practice.</p> <p>In the on-going drive against electric power pilferage, we acknowledge that these rules can only be effective to a certain extent. The administrative costs of installation or relocation may be expected to be prohibitive in the long run. The service drop of 130 meters as against the present length of 30 meters for the metering location is one case in a point.</p>	

ABRECO

Longer periods of public consultations for these rules are needed.

MERALCO

To avoid conflict, provisions under this new draft rule should be aligned with existing rules, which include among others:

1. Magna Carta
2. DSOAR
3. RA 7832
4. RDWR
5. Phil Dist Code

MERALCO

Considering the objectives of EMC, which include the reduction of pilferage and in the process ensure the safety of the public or consumers against the dangers brought about by rampant pilferage, lowering the incidents of meter damage or vandalism and improving the reliability of the distribution facilities and providing better quality of service, Customers/Applicants with records of pilferage, differential billing, or unpaid bills should be made to settle such before their application for connection can be acted upon. Otherwise, non-payment would only tend to encourage these customers to pilfer electricity and avoid EMC.

We propose that the following provision be included in these Rules:

"For a Customer/Applicant with a history of pilferage, differential billings or unpaid bills, per DU's records, his settlement of such obligation shall be a condition for the DU's action upon his application for connection or reconnection."

MERALCO

The proposed Rules contain specific technical requirements such as the use of protective tubing, safety switch, limitation in length of service drop wires, etc. which we believe should not be included in

<p align="center">(EMCs Technical Requirements)</p>	<p>the Rules to give the DUs the flexibility to implement their own design/standard of EMC installations for as long as they conform with all technical and safety requirements of the Philippine Electrical Code, Distribution Code and other rules approved by the ERC.</p>	
<p>Article 1.1 - Objective</p> <p>The objective of these Rules is to provide guidance to Distribution Utilities (DUs) in the installation and relocation of electric meters to elevated metering centers (EMCs) or to other elevated service, in order to ensure their highest level of compliance with safety standards and adequate protection of the consumers' interests through the reduction of the DUs system losses.</p>	<p><u>ABRECO</u> We rely more on the technical vigilance and missionary zeal of our fieldmen in the pursuit of the same objective.</p> <p><u>MERALCO</u> The use of the word <u>through</u> is not appropriate. The reduction of systems losses is not the appropriate means of ensuring highest level of compliance with safety.</p> <p>“ x x x in order to ensure highest level of compliance with safety standards and adequate protection of consumers' interest <u>and accordingly reduce the system loss of DUs.</u>”</p>	
<p>Article 1.2 - Guiding Principles</p> <p>DU shall ensure that installation and relocation of residential electric meters to the EMC or to other elevated service must conform with Republic Act No. 9136, other existing laws, rules, regulations and technical standards.</p>	<p><u>DMC</u> “.....other existing laws, rules, regulations, and the Philippine Electrical Code.”</p>	
<p>Article 1.3 - Scope</p>	<p><u>AMRECO</u></p>	

<p>These Rules shall apply to all DUs and shall cover the installation and relocation of residential electric meters to elevated metering centers or individual residential electric meter to other elevated service as may be specifically provided herein. Billing disputes resulting from the installation or relocation of the meter to EMC services shall be governed by the ERC Rules of Practice and Procedure.</p>	<p>The scope should specifically provide that those KWH meters installed within the height prescribed by the Magna Carta are not subject to these guidelines. It recommend the provision as follows:</p> <p style="text-align: center;"><u>These Rules shall apply to all DUs whose installation of metering is over and above the height prescribed in the Magna Carta and DSOAR and xxx xxx.</u></p> <p><u>RECA 1 & BUSECO 11</u> Exclude DUs complying with the PEC, Magna Carta and DSOAR (1.52meters and 3meters)</p>	
<p>Article 1.4 - Definition of Terms</p> <p>DSOAR - Distribution Services and Open Access Rules promulgated by the ERC under Resolution No. 01, Series of 2006.</p>	<p><u>MERALCO</u> Proposed wording:</p> <p>“1.4 DSOAR Distribution Services and Open Access Rules promulgated by the ERC under Resolution No. 01, Series of 2006, as may be amended.” (since amendments to the DSOAR is under way)</p>	
<p>Elevated Metering Center (EMC) - The structure attached to DU poles or other structures on which a cluster of meters is installed.</p>	<p><u>AMRECO</u> It suggests to add, “.... meters is installed beyond 3 meters form (sic) the ground.”</p> <p><u>SOCOTECO 1</u> There are metering installations that are clustered but not highly elevated. They are EMCs if we based it on the definition stated in the draft rule, however, they also satisfy the Magna Carta provision that requires meters to be located in clean places free from vibration where they are easily accessible for reading and testing by both the DU and consumers.</p> <p>.... “with an elevation of more than 3 meters” or “with an elevation of more than 3 meters and proximity of more than 130¹</p>	

¹ 130-meter distance is hypothetical, copied from the draft Rule

	meters from the consumer building , if proximity of the clustered meter to the consumer building is being considered.	
EMC Service Drop - Includes wires between the EMC installation and the customer's old metering point or to the point where the metering location would have been placed had the customer not been in an EMC area.	<p>RECA 1 The wires defined are actually the service entrance which has been extended. This should be termed as EMC Extended Service Entrance. We recommend also to use this phrase in lieu of EMC Service Drop.</p> <p>CEPALCO In the case for EMC Service Drop, this should only cover up to the point of attachment connecting to the EMC or metering cluster.</p>	
Service Drop - The overhead service conductors from the last pole or other aerial support including the splices, if any, connecting to the service entrance conductors at the building or other structure (Phil. Electrical Code).	<p>RECA 1 Reconcile with the definition of the latest PEC under Article 2.30.2.1</p>	
Line Loss - The component that is inherent in the electrical equipment, devices and conductors used in the physical delivery of electric energy. The term includes both load and non-load losses.	<p>RECA 1 Recommends that this definition be deleted since it has no use in the draft rules.</p>	
Relocation Site (as suggested)	<p>AMRECO The term "Relocation Site" and its definition shall be included in relation to Article 3.2.7.</p>	
<p>Article 2.1 - Magna Carta Requirement</p> <p>Under Article 11 of the Magna Carta, meters, as a general rule, shall be located in clean places free from</p>	<p>MERALCO & DMC The pertinent provisions of the Magna Carta should be cited as is to avoid inconsistencies.</p> <p>Furthermore, we note that for relocation of meters to other areas based on justifiable reasons, the pertinent Magna Carta provision</p>	

vibration where they are easily accessible for reading and testing by both the DU and the consumer. Likewise, meters shall be located on the outside wall of the building or private pole and shall not be more than three (3) meters mounting height from the surface. However, the Magna Carta also allows meters to be located in other areas based on justifiable reasons, provided that the location is accessible to both the DU and the consumer.

does not include the provision that “the location should be accessible to both the DU and the consumer.” Thus, to be consistent with the Magna Carta, the phrase “provided that the location is accessible to both the DU and the consumer” be **deleted**.

We respectfully propose that Article 2.1 be stated as:

Under Article 11 of the Magna Carta, meters, as a general rule, shall be located in clean places free from vibration where they are easily accessible **and visible** for reading and testing by both the DU and the consumer. Likewise, meters shall be located on the outside wall of the building or private pole and shall not be more than three (3) meters **nor less than 1.52 meters mounting height from the surface on which one would stand to repair, or inspect the meter.** However, the Magna Carta also allows meters to be located in other areas based on justifiable reasons.

DMC

The term “accessible” should be defined in two (2) points of view: (1) **Consumer** – meters can be read or have metering data readily available with his naked eye without the use of Equipment; (2) **DUs** – for obtaining metering data.

CEPALCO

Suggestion:

“.....Likewise, meters shall be located on the outside wall of the building or private pole and shall not be more than three (3) meters mounting height from the **ground** surface.”

CEPALCO

Suggests to add “**justifiable reasons**” for meters to be located in other areas as follows:

	<ul style="list-style-type: none"> • Rampant electricity pilferage • No accessible area for DU maintenance/meter reading • Habitual pilferer <p><u>DASURECO</u> Meter clustering is the prevalent practice among DUs. Since this is within the ambit of the general rule set in the Magna Carta, <i>i.e. meters shall be located on the outside wall of the building or private pole and shall not be more than three (3) meters mounting height from the surface</i>, it must be given preferential attention over the exception under which EMC belongs.</p> <p>ERC must come up first with guidelines on meter clustering to make the practice uniform throughout the country.</p> <p><u>SOCOTECO 1</u> Magna Carta also allows meters to be located in other areas based on justifiable reasons, <u>provided that the location is accessible to both the DU and the customer.</u> Hence, clustered metering installation that is accessible to both the DU and the customer is not considered as EMC.</p> <p><u>AMRECO</u> Believes that the conditions prevailing as proposed are unnecessary because EMC has been adopted by DU's to prevent pilferage and in order to reduce system losses within the cap set by the ERC. Hence, the rules should not give the consumers the chance to object such DU policy.</p>	
<p>Article 2.2 – Instances when elevated meters may be allowed</p>	<p><u>MOELCI II</u> Also include in the instances when elevated meters may be allowed are those consumers found to have committed act of pilferages that their meter shall be relocated to EMC at the option of the DU.</p>	

The DU shall be allowed to relocate the meter of the consumer to EMC even in the absence of consumer's request when the DU found the same as urgent and necessary detrimental or prejudicing DU's operation.

The DU is further allowed to install EMC in areas not only with informal settlers but in all areas where pilferage is present such as subdivisions and in all residential areas.

CEPALCO

We would like to seek clarification with ERC the definition of "Other Elevated Service".

DASURECO

Consumers who have been apprehended for pilferage of electricity and theft of electric power lines/materials, as a consequence of their actions, should have their meters automatically transferred to EMCs with costs shouldered by them to deter them from perpetrating the same.

It suggests to include in the instances when elevated meters may be allowed **"KWHR meters of apprehended consumers for pilferage of electricity and theft of electric power lines/materials shall be immediately transferred to EMCs."**

MERALCO

It is not clear who initiates/decides when EMC is available? Article 2.2.2 involves the waiver by the DU of standard documentary requirements before providing electric service. Could an informal settler now demand electric service from a DU using as basis the aforesaid provision?

The provision should be clarified that ultimately it is the DU that would decide if EMC is necessary or may be made available.

	<p>Furthermore, the provision includes:</p> <p>“2.2.2 Areas with informal settlers without title or rights over their occupied lands resulting to rampant illegal service connection, meter vandalism, and meter tampering”</p> <p>There should be an additional provision in this particular section, for cases wherein the customers in areas with rampant illegal connection but are not informal settlers.</p> <p>We propose:</p> <p>“No meter shall be installed or relocated to elevated metering centers or other elevated service, except when the DU determines that any of the following circumstances are present: xxx</p> <p>We further propose the following as additional instance when EMC may be allowed:</p> <p>“Areas where based on the records of the DU there exists high incidence of Illegal Service Connections, Meter Vandalism and Meter Tampering.”</p> <p><u>BUSECO II</u></p>	
--	---	--

	<p>1. This action shall be at the discretion of the DU whether or not to relocate such meters in the area.</p> <p>2. The DU shall only make a computation to prove that there is truly a rampant illegal connection in the area resulting to system losses. Thus, the DU shall not be required to submit any supporting documents pertaining to land titles or rights of the consumers in the area.</p>	
<p>2.2.1 Non-availability of right-of-way</p> <p>Right-of-way is required by the DU to enable its personnel to respond to emergencies and complaints as well as to construct its distribution posts and other power distribution equipments. The DU shall exert utmost effort in acquiring such right-of-way. Prior to the elevation of the meters to EMC or other elevated service², the DU shall submit an explanation to the affected consumer as to its inability to secure the right-of-way.</p>	<p><u>CEPALCO</u> Suggest changing to “The DU shall exert utmost effort in acquiring such ROW <u>in accordance with the pertinent provisions of the DSOAR on Easement.</u>”</p> <p><u>MERALCO</u> Article 2.2.1 does not specify how the explanation will be submitted to the customer by the DU for compliance to this provision.</p> <p>“..... Prior to the elevation of the meters to EMC, the DU shall write an explanation to the affected consumer as to its inability to secure the necessary right-of-way.”</p> <p>We suggest that the revised above statement for clarity of compliance by the respective DU.</p> <p><u>BUSECO II</u></p>	

² Proposed addendum to the existing provisions

	<ol style="list-style-type: none"> 1. This provision must specify the standards to justify that a DU has exerted its utmost effort in acquiring the right of way. 2. Those customers whose meters are to be relocated, but right of way is still to be acquired by the DU, the DU will just have the right of way document duly received by the customer and give the customer enough time to return to the DU such document. Failure of the customer to return the document to the DU will construe the automatic relocation of the meter to the EMC. 3. There is no need for the DU to explain to the customer in its inability to <p>acquire right of way because it is the DU who made the effort in communicating such to the customer.</p>	
<p>2.2.2 Areas with informal settlers without title or rights over their occupied lands resulting to rampant illegal service connection, meter vandalism, and meter tampering</p>	<p><u>RECA 1</u> We suggest that we also include even <u>areas with formal settlers</u> with the same reason, which maybe applicable.</p> <p><u>SOCOTECO 1</u> Illegal service connection, meter vandalism and meter tampering are only rampant in areas with informal settlers in metro cities. In rural areas, rampant meter tampering is not caused by informal settlers, but caused by some economic trend or cultural behavior/practices.</p> <p>Article 2.2.2 be written as:</p> <p>“Areas where rampant illegal service connection, meter vandalism and meter tampering”</p> <p><u>ILPI</u> This criterion should not limit to informal settlers, rather the qualification should focus on rampant illegal service connection regardless of the location whether the settlers are formal or informal.</p> <p><u>DMC</u> The presence of informal settlers does not necessarily lead to rampant illegal service connections.</p>	

	<p><u>Suggested Revision:</u></p> <p>2.2.2 Areas With High Incidence of Illegal Service Connections, Meter Vandalism, and Meter Tampering</p> <p><u>COLIGHT</u></p> <p>It must be allowed to all areas/customer who have rampant illegal service connection whether informal settlers or not.</p>	
<ul style="list-style-type: none"> • 2.2.3 Consumer requests <p>Written requests from legitimate DU consumers for the elevation of services to metering centers because of frequent pilferage-related power interruptions, shall also be given due consideration. Provided, that said consumers represent at least fifty (50) percent of the total number of registered households in the area whose meters are proposed to be relocated, duly certified by the Office of the Mayor concerned.</p>	<p><u>CEPALCO</u></p> <p>There is a need to clarify with ERC or request definition of “frequent pilferage-related power interruptions”. Suggest using the SAIFI method. Also, there is need to determine the threshold level as basis of SAIFI.</p> <p>Also, for consumer request, they should handle the cost of the EMC service drop to the supposed metering location including the circuit protection.</p> <p>Add as second par. to 2.2.3:</p> <p>“EMC may also be implemented by the DU due to electricity pilferage.”</p> <p><u>DASURECO</u></p> <p>Consumers requesting for the elevation of their meters to metering centers should bear the cost of materials and labor, given that said act is not the DU’s initiative but theirs. This is to avoid the evils of consumers easily grouping themselves together and falsely claiming</p>	

the necessity for such transfer as they would not incur any expense for such request.

Add "2.2.3Provided further that the said DU consumers shall shoulder the cost of materials and labor for such transfer."

ZAMECO II

Suggestion & Recommendation: Provided that said consumers represent at least fifty percent (50%) or majority of the total number of registered households in the area whose meters are proposed to be relocated, in a petition filed by the households owners duly certified and/or endorsed/approved either thru the resolutions of the Barangay Council or of the Office of the Town/City Council and/or endorsed or certified by the Office of the Mayor concerned.

(ie; one or both of the above local government units (LGU) endorsement present will suffice to the requirement of this rule).

COLIGHT & DAVAO LIGHT

It should be the initiative of the DU to have EMC in frequent pilferage areas without written requests from consumers and certification from the Mayor so the DU can immediately address safety concerns and eliminate pilferage.

ILPI

Should not require 50% to total no. of households. Action taken should be based on actual occurrence of pilferage-related interruptions, as reported by the legitimate consumer and verified by the anti-pilferage group by a DU. Also, requiring certification from

the Office of the Mayor will be subjected to any unnecessary political interventions.

Suggestion: Delete the 50% requirement and the Certification from the Office of the Mayor.

RECA 1

Consumers need not request because utilities always make corrective measures to any complaint.

We suggest the Building Official to certify instead of the Office of the Mayor.

MERALCO

In most cases, in areas with rampant illegal connections, legitimate customers are afraid to request for the elevation of services to metering centers. They are fearful of the possible harm that people involved in illegal connections may do to them once known that they were the ones requesting for such relocation of meters. Hence, the provision in the draft rules requiring consumers represent at least 50% of the total registered households in the area whose meters are to be relocated may not be realistic.

We respectfully recommend that for as long as there are areas with rampant illegal connections, as determined by DUs, the latter should be allowed to elevate meters.

BUSECO II

	<p>This rule should identify a threshold level of 50% or at least 15 consumers of the registered households in the area, whichever is higher. If the number of consumers goes below 15, it is very costly for the DU to accommodate the request for the relocation and elevation to elevated metering centers.</p> <p>In order to facilitate the request, it shall be the discretion of the DU and the Certification from the Mayor concerned shall not be required.</p>	
<p>Article 3.1 Cost of installations or relocations</p>	<p><u>RECA 1</u> (Comments for Articles 3.1.1 to 3.1.5)</p> <p>The DU should not refund the cost of the Extended Service Entrance (EMC Service Drop) in as much as DU will eventually replaced the wires in the future at no cost to the consumer.</p> <p>For new consumers at pole metering (not EMC) the Extended Service Entrance (EMC Service Drop) beyond 30 meters should be borne by the consumer, same as the provision in the Magna Carta.</p> <p><u>DECORP</u></p> <p>Considering the costs that this EMC or other elevated service entail, would these translate in increase in metering cost?</p>	
<p>Article 3.1.1</p> <p>For existing consumers whose meters are to be relocated to EMC installations, including relocation falling under Article 2.2.3 hereof, or relocation of</p>	<p><u>MERALCO</u></p> <p>Relocation falling under 2.2.3 refers to consumer request. In such cases, the DU should not be the one to shoulder the cost of relocation. We should make this provision consistent with Article 11 of the Magna Carta, which provides that:</p> <p>“A customer shall bear the cost of relocation of his electric meter under the following circumstances:</p>	

<p>existing individual consumer to elevated service, the DU shall shoulder the cost of relocation including the cost of service drop wires and all necessary conduits coming from the EMC frames down to the old metering point;</p>	<p>1. The customer requests for the relocation of his electric meter, for reasons other than those provided in the first paragraph x x x “ (Emphasis supplied)</p> <p>Thus, it is suggested that the phrase "including relocation falling under Article 2.2.3 hereof" be removed.</p> <p>We also propose that this section also include a provision where the customer shoulders the cost of relocation, including other fees collected by the government (CEI), for instances when the requests for relocation are made by the customer (as cited in section 2.2.3.).</p> <p><u>PELCO 3</u></p> <p>Please take note that consumer service drop wires are of the overhead type of wiring installation (duplex wire no. 6) as in the case provided for and by the cooperative to its member consumers. Employing the <u>necessary conduits</u> to protect the service drop wires is somehow absurd and improper. This application will entail large amount of financial resources and will adversely affect our operation and market competitiveness in the near future.</p> <p>Inclusion of the necessary conduits in the propose draft be omitted/stricken off from the records.</p> <p><u>BUSECO II</u></p>	
--	--	--

	<p>If the provisions in the Magna Carta for Residential Consumers and in the DSOAR have been duly complied by the DU, and still the consumer requested for the relocation of the meter, then the cost of the relocation, including the cost of service drop wires and other necessary conduits shall be shouldered by the consumer, not by the DU.</p> <p>This becomes in conflict or inconsistent with</p> <p>the provisions stated in Magna Carta Article 11 in which it is the customer who shall bear the cost of the relocation of the meters when the consumer requested for it.</p> <p>Relocation falling under 2.2.3 of this Rule shall be borne by the consumer. The DU shall only bear the cost of the 30 meter-line, and any excess shall be borne by the consumer, as stated in Magna Carta Article 14 Paragraph 1.</p>	
<p>Article 3.1.2</p> <p>For existing consumers whose meters are already relocated to EMC installations but whose expenses in acquiring service drop wires including all necessary conduits were borne by the consumers, the DU shall refund immediately the cost of such drop wires, upon presentation of proof of purchase.</p>	<p><u>AMRECO</u></p> <p>If consumers previously relocated will be refunded the guidelines again will become retroacted. The cost involved is not covered by the DU's rate.</p> <p><u>PELCO 3</u></p> <p>This provision is too pro consumer. Our utility is an electric cooperative and therein, member consumer ship active participation is a must in any coop related activities.</p> <p>We suggest that expenses borne by the consumers after the</p>	

approval of this provision, the coop/DU shall be constrained to refund the expenses immediately, upon presentation of proof of purchase.

This provision need not be retroactive and unilateral, and in our case it's too much a burden to make ends meet.

ILPI

What is the manner of computing the amount to be refunded to the customer if proven that the customer indeed purchase the drop wires and the necessary conduits?

It should be the actual OR that will be represented by the customer to claim such refund. The amount of refund should be calculated based on the optimized depreciated replacement cost not on actual purchase cost.

SOCOTECO 1

Let this be prospective in application. Using cost causation principle in ratemaking, the one that causes the cost shall bear it. Also, in Article 11 of the Magna Carta, it states that a customer shall bear the cost of relocation of his electric meter under the following circumstances:

1. The customer requests for the relocation of his electric meter, for reasons other than those provided in the first paragraph; or
2. The meter installation fails to meet the conditions under the first paragraph...

For deletion. An exception to shoulder the cost be allowed for DUs. For consumers whose meters were relocated due to illegal service

	<p>connection, meter tampering, or any form of pilferage, the consumer shall handle the cost of relocation. Further, if the request for relocation is due to Article 11 par. 3, the consumer shall handle the cost of relocation.</p> <p><u>MERALCO</u></p> <p>We propose that DUs be allowed to submit its plan for the refund.</p> <p>It is suggested that a provision be added. The same should read:</p> <p>“ x x x the DU shall refund immediately the cost of such drop wires, upon presentation of proof of purchase. For this purpose, the DU shall submit a refund scheme for ERC approval.”</p> <p><u>BUSECO II</u></p> <p>The Commission should state in this Rules whether it is retroactive or prospective in order to circumvent the disputes in interpreting these Rules.</p>	
<p>Article 3.1.3</p> <p>For new consumers applying for service connections in areas served through EMCs, the DU shall shoulder the cost of the</p>	<p><u>PELCO 3</u></p> <p>We propose a 50% equity on the part of the consumer be borne to shoulder the cost of service drop wire in excess of 30 meters as provided in the Magna Carta.</p> <p><u>BUSECO II</u></p> <p>Same suggestion in Article 3.1.1</p>	

<p>service drop wires from the EMC down to the point where the metering location would have been placed had the consumer not been in an EMC area. It is understood that these new consumers have complied with the requirements for new electric service connection.</p>		
<p>Article 3.1.4</p> <p>For a new consumer whose meter is to be installed in an elevated service, the DU shall shoulder the cost of the service drop wires and all necessary conduits from the meter down to the point where the metering location would have been placed had the consumer not fallen in any of the acceptable circumstances enumerated in Article II hereof.</p>	<p><u>CEPALCO</u></p> <p>It does not agree that the utility will bear the cost as mentioned hereof. Wires and accessories that are already in the load side should be borne by the customer, otherwise the rest of the customers will be unjustifiably subsidizing.</p> <p><u>AMRECO</u></p> <p>Installation of meters to EMC should have no condition to be complied it should be the discretion of the DU because it is the DU who will borne the expenses, hence, this provision is no longer necessary.</p> <p><u>PELCO 3</u></p> <p>Same proposal as suggested in Art. 3.1.3 to encourage consumers to safeguard their service connections from theft, vandalism, etc.</p> <p><u>BUSECO II</u></p> <p>Same suggestion in Article 3.1.1</p>	

<p>Article 3.1.5</p> <p>No other charges shall be required by the DU for new consumers applying for service connections in areas served through EMCs or for a new consumer whose meter is to be installed to an elevated service, other than those approved by the ERC.</p>	<p><u>MERALCO</u></p> <p>Collection of charges for pilfered electricity is allowed by RA 7832. Hence, the statement should allow for bill collection that will constitute the prior consumption of customers that were not registered as sales. An estimation method for calculation may be derived from the methods prescribed under RA 7832 or an average computation for a typical EMC customer.</p> <p>We respectfully recommend that DUs be able to recover based on an estimated consumption for a maximum of one year the pilfered electricity enjoyed by the new customer as a requirement of his application for service.</p> <p><u>AMRECO</u></p> <p>It must be clear on what are these specific charges, if it only pertains to meter installation.</p>	
<p>Article 3.2.1</p> <p>The length of the service drop wires shall not be more than one hundred thirty (130) meters from the EMC or other elevated service to the point where the metering location would have been placed had the consumer not been in an EMC area or in</p>	<p><u>MERALCO</u></p> <p>The length of the service drop wires should not be limited to 130 meters because it depends on the location of the household to be served. With this limitation, households beyond the 130-meter distance might be denied electric service. If the intention of the Commission is to minimize line losses, a larger size of wire can be used to serve those beyond 130 meters in order to compensate the increase in line loss.</p> <p>We respectfully suggest that this provision be deleted.</p> <p><u>CEPALCO</u></p>	

<p>other elevated service.</p>	<p>Query:</p> <p>Why is the length of service drop wire 130 meters? What is the basis? What is the prescribed EMC height?</p> <p><u>AMRECO</u></p> <p>It is impractical to rural areas because in these areas, lifeline customers are scattered mostly more than 130 meters in length from existing secondary lines and it is also expensive if EC's will keep on extending secondary lines just to comply with the 130 meters distance. In doing so, it has impact on system loss and CapEx.</p> <p><u>PELCO 3</u></p> <p>This is disparity and disenfranchise. Every household has the right to basic services such as electricity. In rural areas which are sparsely populated, the cooperative will be constrained to construct additional distribution lines which are too costly and disadvantageous to its well being just to serve every rural homes and thus bring closer the nearest electrical service tapping not exceeding 130 meters.</p> <p><u>COLIGHT</u></p> <p>EMC locations are selected based on pilferage-free location which is sometimes more than 130 meters due to primary line extension which is not possible in interior part of the areas (right-of-way problem).</p> <p><u>DMC</u></p> <p>(1) The length of wire from EMC or other elevated service to</p>	
--------------------------------	--	--

	<p>metering location should be DU specific. This is dependent on the type of load, wire specification, etc. and is also addressed in IV/4.1.1 Voltage Variation Requirement of the said Rules. Voltage Variation Requirements should not discriminate Users (lower for industrial and commercial, higher in residential).</p> <p>The maximum length should be DU specific and provisions for Contribution in Aid of Construction (CIAC) of DSOAR should be adopted.</p> <p>(2) With EMC, the grounding electrode is taken away from the Customer's premises and is installed at EMC Poles. If in case this grounding electrode is removed, the Distribution Transformer (DT) becomes an Autotransformer which will result to a High-Voltage (HV) to the Customer Side due to the unbalance current.</p> <p>Grounding provisions should be reviewed and incorporated in this Rules in accordance with the minimum safety requirements as provided for in the Philippine Electrical Code (PEC).</p> <p><u>ILPI</u></p> <p>Is the 130 meters refers to circuit distance or the total length of wire? Maybe, the more appropriate rate would consider the mix of amount kept in restricted funds and that actually used by the DU.</p> <p><u>RECA 1</u></p> <p>The nominal voltage level as required in the PDC shall be the basis instead of the length of wire. The length can be reduced or increase</p>	
--	---	--

	<p>as long as the nominal voltage level is attained.</p> <p><u>BUSECO II</u></p> <p>This provision shall have prejudice to those consumers who are located more than 130 meters from the elevated metering centers. Taking into consideration the real scenario especially in rural areas where residential consumers are scattered beyond 130 meters. How then can this provision be fair to these people? Are they now the ones responsible for paying for the excess lines because they are</p> <p>located beyond what has been provided in this Section?</p> <p>The DU shall have the discretion to relocate meters based on justifiable reasons.</p>	
<p>Article 3.2.2</p> <p>The DU shall maintain the usefulness of the service drop wires from the EMC or other elevated service down to the point where the metering location would have been placed had the consumer not been in an EMC area or in other elevated service,</p>	<p><u>PELCO 3</u></p> <p>Cost of replacement of service drop wire of consumers due to wear and tear must be equally shared to promote awareness in safeguarding electrical service connections.</p> <p><u>CEPALCO</u></p> <p>This is contrary to the existing practice of the utilities.</p>	

<p>including its replacement due to wear and tear.</p>		
<p>Article 3.2.3</p> <p>Sagging of service drop wire/s shall not be greater than those allowed by the Philippine Electrical Code and the DSOAR.</p>	<p><u>MERALCO & DMC</u></p> <p>We respectfully suggest that this particular provision be transferred under Article IV.</p>	
<p>Article 3.2.4</p> <p>The DU shall house or insulate the service drop wires or any individual service drop wire with a protective tube or material to protect the said wires from electricity theft/tampering.</p>	<p><u>PELCO 3</u></p> <p>This provision is too costly for a striving coop.</p> <p><u>CEPALCO</u></p> <p>Place the wires in free space and secured it with the use of wire holders.</p> <p><u>ILPI</u></p> <p>(Articles 3.2.4 to 6) Delete this provision. Expensive for a DU and an added costs to customers either engaging in pilferage or not.</p> <p><u>VECO</u></p> <p>(Articles 3.2.4 to 5) Deletion. It is costly, difficult to maintain, dangerous and cannot guarantee deterrence from theft, and there is no standard for overhead service to be housed in tube in PEC.</p> <p><u>DAVAO LIGHT</u></p>	

	<p>Deletion. This is not feasible and not practical to use because a customer's load side wire will continue to branch out and will be difficult to trace.</p> <p><u>DMC, MERALCO & RECA I</u></p> <p>Not a guaranteed solution against electricity theft. This should be made optional to the DU. Thus, "3.2.4 The DU may house or insulate....."</p> <p><u>COLIGHT</u></p> <p>(Articles 3.2.4 to 5) Group of service wire in protective tube will reduce wire ampacity, and will also become time-consuming to trouble shoot. One overloaded service wire can cause power interruption of all service wires in the group.</p>	
<p>Article 3.2.5</p> <p>No more than ten (10) service drop wires shall be housed with a protective tube or material and not more than thirty (30) electric meters shall be installed per EMC frame.</p>	<p><u>DASURECO</u></p> <p>It is the consumer who should shoulder the costs of protecting the wires.</p> <p><u>MERALCO & DMC</u></p> <p>We respectfully suggest that this provision be deleted. The limitation should not be on the count but rather on the technical capability of the EMC supporting structure. For as long that it follows good engineering design according to acceptable standards, there shouldn't be any problem.</p>	

Article 3.2.6

The DU shall restore the electric service within twenty four (24) hours in case of outage due to the tripping action of protective devices during faults or the failure of primary distribution lines or transformers.

RECA I

Delete. Already covered by other guidelines such as customer services.

MERALCO

The same service standards for regular customers shall also apply to customers served by EMCs. DUs are committed to perform within the standards set in the PIS of the RDWR. This provision is already included in the Guaranteed Service Level (GSL) scheme of DUs already under PBR.

Furthermore, there may be instances when restoration of service within 24 hours is not feasible, for reasons outside the reasonable control of the DU. We propose that such instances be deemed an exemption to the 24-hour restoration requirement of this provision, provided that the customer is duly informed of the same.

Proposed wording:

“3.2.6or transformers, **except when such restoration is not possible or cannot be made within the twenty-four (24) hour period for reasons outside the reasonable control of the DU. In such a case, the DU shall advise the customer of said fact and the reason thereof.”**

DMC

Delete, already included in the Guaranteed Service Level (GSL)

	<p>scheme of DUs already under PBR.</p> <p><u>CEPALCO</u></p> <p>This should be based on the DU's PIS declared threshold level.</p>	
<p>Article 3.2.7</p> <p>The DU shall coordinate with the concerned Local Government Unit (LGU) for the relocation site.</p>	<p><u>PELCO 3</u></p> <p>This would affect ECs status of being non-partisan.</p> <p><u>DMC</u></p> <p>Delete. This provision is already part of the information campaign before the elevation of meters under Article 3.2.10.</p> <p><u>DASURECO</u></p> <p>Delete. It will hamper DUs operations for LGUs are slow in responding constituents' requests.</p> <p><u>AMRECO</u></p> <p>It is unnecessary, because what if EMC is located in distribution poles.</p> <p><u>BUSECO II</u></p> <p>Delete. Impractical.</p>	

<p>Article 3.2.8</p> <p>The DU shall, at all times, provide its consumer access to meter reading and testing.</p>	<p><u>RECA I</u></p> <p>“The DU shall upon proper coordination and when necessary, provide its consumer access to meter reading and testing.”</p> <p><u>MERALCO & DMC</u></p> <p>Providing consumer access to meter reading and testing of elevated meters using basket trucks pose safety hazards to customers when they are hoisted to read the meter. Basket trucks are used only by trained personnel. Furthermore, this would be costly and difficult to implement. Hence, we suggest that for customers whose meters are elevated, easy access to meter reading information thru pictures from digital camera would suffice.</p> <p>We propose:</p> <p>3.2.8 The DU shall, at all times, provide its consumer access to meter reading <u>information</u> and testing <u>results</u>.</p> <p><u>CEPALCO</u></p> <p>3.2.8 “The DU shall, at all times, allow its consumers to witness meter reading and testing.”</p>	
<p>Article 3.2.9</p>	<p><u>CEPALCO</u></p>	

Metering information should be made available to both the DU and the consumer. Relocation of meters in EMCs or other elevated service may be allowed provided that the DU adopts measures to allow consumers a means to verify the meter-reading information.

All metering information concern should be referred to DSOAR.

VECO

Deletion. We seek clarification on what kind of testing is being meant in this provision, also, if this refers to in-service or before installation? When height for EMCs is higher, access to meter readings and testing is impractical, for customers have to be lifted up which is not safe.

MERALCO

We believe there is no need to mention DU in the said provision as it is deemed that the DU has the necessary metering information.

However, we would like to be clarified as to what the following provision means: “The DU should adopt measures to allow consumers a means to verify the meter-reading information”. We note that the latter sections already provide for various means of verifying meter-reading information.

We recommend that the provision read as follows:

3.2.9 Metering information should be made available **to the consumer.** x x x

Furthermore, Article 2.11.2 of the DSOAR states that “Every DU shall instruct its meter reader when reading periodically the meter installed in the premises of a customer, to leave in such premises a record showing the date of the reading, the reading made, the previous reading and the total consumption expressed in units of service used, as read by the meter reader, and the signature over the printed name of the meter reader.”

In view of the foregoing, we suggest that this provision be deleted

	since it is already covered by the aforementioned DSOAR provision.	
<p>Article 3.2.10</p> <p>Before clustering or actual elevation of the meter/s, the DU must conduct an information campaign/forum in the affected area, or show proof, in case of individual consumer, on why there is a need to cluster or elevate the meter/s and the procedures to be adopted in implementing the same.</p>	<p><u>BUSECO II</u> Delete. Impractical</p> <p><u>AMRECO</u> Delete. Clustering should be a DU policy.</p> <p><u>VECO</u> (Articles 3.2.10 to 15) Deletion. It is costly to have meter readings witnessed by customer representative/s, read twice and send report to customer for abrupt kWh changes.</p>	
<p>Article 3.2.11</p> <p>The DU shall conduct meter readings twice every billing month and shall prepare a monthly report on any abrupt change in kilowatthour consumption by a consumer. For this purpose, abrupt change in kilowatthour consumption means an increase by one hundred percent (100%) or decrease by fifty percent (50%) of consumption based on the average 12-month consumption</p>	<p><u>BUSECO II</u> Delete. Impractical</p> <p><u>RECA I</u> Once a month monitoring. Reporting, quarterly for the 1st year, semi-annually for the 2nd year, and annually thereafter.</p> <p><u>ZAMECO II</u> Meter reading of consumers twice in a month shall only be applicable to those consumer's meter who have been suspected of meter tampering, illegal connection, frequent deficiencies or disparity in the meter readings. All other meters (in good conditions) which have not</p>	

immediately preceding the billing month in question.

recorded any abrupt changes and had maintained the monthly average consumption shall be exempted from this rule.

AMRECO

Delete. Highly expensive.

Recommends that herein definition of “abrupt change” shall be adopted in all cases.

MOELCI II

Suggests that DUs be given options on the matter to create its own internal policy provided it conforms with the Magna Carta.

MERALCO & DMC

Conducting meter-reading twice every billing month would require unnecessary additional costs to the DU which will ultimately be paid for not just by customers in EMCs but all consumers of the DU in terms of higher metering charges.

It should be considered that the basis for determining abrupt change is the 12-month consumption immediately preceding the billing month and the report is prepared on a monthly basis. Thus, the data that would be gathered in the middle of the month, if readings are made twice every billing month, would not serve its purpose and would be rendered useless as the monthly consumption would still be the one used as basis of determining any abrupt change.

Finally, we would like to clarify the purpose of the monthly report.

We therefore suggest a change in language to conform with Magna Carta & DSOAR provision on meter reading.

We propose:

	<p>3.2.11 The DU shall conduct meter readings <u>once</u> every billing month <u>and shall follow rules and accepted practices for complaints handling under the Magna Carta Article 13 (Right to a Prompt Investigation of Complaints; Customer Dealings).</u></p> <p><u>COLIGHT</u> Once a month reading is sufficient.</p> <p><u>DAVAO LIGHT</u> Read meters once every billing month.</p> <p><u>SOCOTECO I</u> For deletion, or provide higher rate than those that are regularly connected, or a connection charge be applied with increment in the metering and supply charges.</p> <p><u>CEPALCO</u> Delete, it will only incur added DUs operational costs.</p> <p><u>DECORP</u> What is the reason behind the requirement of 2 meter readings in a month and what is the basis for the definition of “abrupt change”?</p>	
<p>Article 3.2.12</p>	<p><u>PELCO 3</u></p>	

Consumers in other elevated service shall witness the meter readings, or in the absence of such consumers, their appointed representative shall serve as the default witness to such meter readings.

(Articles 3.2.12 to 13) Require ECs to employ latest top of the line imaging technology to show proof of the correctness of meter readings.

CEPALCO

(Articles 3.2.12 to 16) Consumers can verify anytime the meter reading thru the bill or meter reading cards. Replace “**shall**” by “**may**”.

ILPI

(Articles 3.2.12 to 16) Delete. Not safe for a consumer to be hoisted in a basket truck. The DU is obliged to re-check the reading if a consumer questions its correctness.

SOCOTECO I

Delete. Not safe for a consumer to be hoisted in a basket truck. A digital photo of the reading done would be enough.

COLIGLHT

(Articles 3.2.12 to 14) This is time-consuming, and the consumer might not participate, resulting to the meter not being read. They can request for their historical consumption for verification and clarification.

MERALCO

The provisions (3.2.12 and 3.2.13) appear to mandate that meter readings in EMC areas and other elevated service shall be witnessed by consumer or representative.

	<p>This is inconsistent with article 3.2.14, where it provides that it is optional on the part of the representative to appear at the time of the meter reading.</p> <p>We propose:</p> <p>3.2.12-13: Barangay Chairman, or his authorized representative shall be the designated representative of the consumers in EMC areas who will witness the meter readings.</p> <p><u>AMRECO</u></p> <p>(Articles 3.2.12 to 14) It is unnecessary/impractical/not applicable at all times. Applicable only to big/commercial/industrial load not to include residential consumers especially those with minimal consumption in case of consumer dispute.</p> <p><u>BUSECO II</u></p> <p>Suggests to add “that the consumer will inform or request the DU if he wants to witness the meter reading. In the absence of such request, the DU shall not be barred to conduct meter reading.”</p> <p><u>MOELCI II</u></p> <p>(Articles 3.2.12 to 14) This should be made optional depending on the requests of the consumer, anyway DUs are open to all consumer complaints.</p>	
<p>Article 3.2.13</p> <p>Consumers in EMC areas shall designate a representative/s who</p>	<p><u>BUSECO II</u></p> <p>Suggests to add “that the designated representative or the Barangay Chairman or his appointed constituent in EMC areas will inform or request the DU if he wants to witness the meter reading. In the</p>	

<p>will witness the meter readings, but in the absence of such representative, the Barangay Chairman or his/her appointed constituent shall serve as the default witness to such meter readings.</p>	<p>absence of such request, the DU shall not be barred to conduct meter reading.”</p> <p><u>MERALCO</u></p> <p>For consistency, it is suggested that when a DU sends a notice and the consumer or representative fails to appear, it is deemed that said consumer waived his/her right to witness the meter reading.</p> <p><u>CEPALCO</u></p> <p>Replace “shall” by “may”</p>	
<p>Article 3.2.14</p> <p>The consumer/s’ representative/s must be duly informed of the conduct of the meter reading on a designated date and time at least two (2) days prior to the scheduled reading date. The consumer/s’ representative/s shall have the option to be present at the time of the meter reading.</p>	<p><u>CEPALCO</u></p> <p>Delete since ERC already requires DUs to have this info on its bills per DSOAR.</p> <p><u>BUSECO II</u></p> <p>Only upon the request of the consumer, information regarding the schedule of meter reading may be conveyed.</p> <p><u>DAVAO LIGHT & DASURECO</u></p> <p>Delete. Reading is done regularly every month, no need to repeat the info unless there is a significant change in the date.</p> <p><u>MERALCO</u></p> <p>Several representatives from the customers may result to a more time consuming and inefficient conduct of meter reading.</p> <p>Furthermore, since the reading date is regularly done on the specific day of the month with a (+/-) 1 day variation, we respectfully suggest that a one-time notice to the customer through a posting of notice to</p>	

the barangay hall will suffice. Also, we suggest that time specific schedule be limited to morning and afternoon schedule only due to operational considerations. Thus,

3.2.14 The **Barangay Chairman, or his authorized representative** must be duly informed of the conduct of the meter reading on a designated date at least two (2) days prior to the scheduled reading date. **Posting of the meter reading schedule per EMC area at the pertinent Barangay Hall shall be deemed compliance with this requirement. Failure of the Barangay Chairman, or his authorized representative to appear during the meter reading shall be deemed a waiver of their right to witness the same.**

ZAMECO II

In EMC areas, where electricity theft is rampant, no advance notice shall be made but the DU shall request the barangay officials concerned to act as witness in the reading. It shall also record and log in the barangay blotter the data collected/findings on such reading date in case of litigation.

In other elevated service areas and for billing purposes, the DU shall not give an advance notice to the consumer on the conduct of the 1st meter reading since such is a regular reading schedule and is already known to the consumer. The 2nd reading would only be made if the consumer questions the accuracy of the 1st reading. If the consumer agrees with the correctness of the 1st reading, said consumer may waive his right to the conduct of a 2nd reading by informing the DU.

DECORP

2-day prior notice may no longer necessary as consumers already know of the scheduled monthly reading.

<p>Article 3.2.15</p> <p>In reading the meters, the DU shall use either basket trucks to hoist the meter readers and the consumer/s' representative or high-resolution digital still or video cameras with zoom-in capabilities to capture the images of the meter/s showing distinctly the registration/s of the said meter/s.</p>	<p><u>RECA I</u></p> <p>Only upon request of the consumer if and when necessary. This provision should not apply to pole metering which meets the clearances of the PEC and Magna Carta.</p> <p><u>AMRECO</u></p> <p>(Articles 3.2.15 to 16) This should apply only to DUs whose meters are installed in poles in excess of three meters.</p> <p><u>DASURECO</u></p> <p>Use of digital photography in meter reading is expensive. DUs are using IR meter reading gadgets which are accurate and precise. Resolution of billing disputes should be left in the hands of the DUs.</p> <p><u>MERALCO & DMC</u></p> <p>We suggest that the requirement for the consumer to be hoisted in the basket truck be deleted from the provision because riding the DU's basket truck poses a hazard to the customer. Basket trucks are designed for use only by trained personnel (either as operator or rider).</p> <p><u>COLIGHT</u></p> <p>High magnification binoculars can also be used.</p> <p><u>BUSECO II</u></p> <p>Hazardous to consumers. The ERC should set or make other rules allowing DUs to cluster meters within the prescribed height.</p>	
--	--	--

<p>Article 3.2.17</p> <p>DUs shall issue meter reading cards that will be filled-up by the meter readers with the monthly readings, minus the line losses referred to in Article 5.1 hereof. The DU shall furnish the designated consumer or consumer representative the previous and present month's readings for each meter located at the affected EMC or other elevated service, except when the statement of account for that billing period is issued within two (2) days from such reading date. The DU shall likewise furnish the consumer/s' representative the pictures, if available, taken during the reading of the meter/s showing their registration.</p>	<p><u>RECA I & MOELCI II</u></p> <p>DUs employing read and bill gadget that registers the previous readings should be exempted in using meter reading card.</p> <p><u>AMRECO</u></p> <p>It is very expensive and impractical to rural areas whose customer with less than 10 kWh. It can only be done on selected consumers like big/commercial and industrial loads.</p> <p><u>DASURECO</u></p> <p>It is duplication. The billing being sent to consumers suffices.</p> <p><u>MERALCO & DMC</u></p> <p>The information that will be provided through the issuance of a meter reading card is already contained in the statement of account that will be issued to the customer two days after the reading date.</p> <p>Requiring the meter reader to compute the line loss and deducting it from the monthly reading is operationally difficult to implement. (See comment on Article V). Moreover, the resulting technical line loss is very minimal such that it would not justify the costs involved in re-designing the entire billing system of DUs to accommodate this proposed provision.</p> <p>Furthermore, requiring that pictures be furnished each customer would not be feasible due to the volume of the printouts to be submitted to the representative. Note that a typical EMC installation serves more than a hundred residents.</p> <p>The provisions requiring DUs to keep the pictures of the meter registration for three months and to make these available upon</p>	
---	--	--

request of the customer when the correctness of the readings are in question (see Article 3.2.16) should already address this concern.

We propose:

3.2.17 The DU shall furnish the designated consumer or consumer representative the previous and present month's readings for each meter located at the affected EMC or other elevated service, except when the statement of account for that billing period is issued within two (2) days from such reading date.

Furthermore, Article 2.11.2 of the DSOAR already provides for the meter reading notice with partially a similar function as provided by the meter reading card. Hence, meter reading cards are not necessary. On the issue of the line losses computation, we are suggesting that this particular provision be deleted since the perceivable line losses that the customer will incur may be addressed technically by installing a bigger wire size for efficiency.

COLIGHT

Present and previous readings are already indicated in the billing statement. KWh history is available at the office upon request, and this should be applied only to customer who will request to have meter reading cards.

SOCOTECO I

The cost should be shouldered by the consumer as it is his request to have a copy. The electronic file when viewed is already enough. If the consumer request for a developed copy of the picture, the consumer shall pay the cost of developing/printing and the necessary service fees.

	<p><u>BUSECO II</u></p> <p>This is time inefficiency. DUs are using read-and-bill gadgets where meter readers are not bringing meter cards.</p> <p>Line losses beyond metering facility shall be borne by the connected consumer and not the DU because it is unfair for other consumers of the DU to shoulder such line loss not theirs.</p> <p><u>ILPI</u></p> <p>Reconsider. Not all meter readers are equipped with knowledge in computing technical losses. Also, it requires additional test equipment to get the actual current flowing on the metering outfit and the actual distance beyond the 130-meter requirement, which will delay the meter reading process.</p> <p><u>PELCO 3</u></p> <p>Our meters are of the induction type or mechanical and not electronic TOU type with advance feature which can provide correct info of load currents at any given time.</p>	
<p>Article 3.2.18</p> <p>The DU shall process requests involving relocation or new connection to an EMC service in a timely manner and shall not give preference or discriminate existing consumers or connection applicants based on the distance</p>	<p><u>AMRECO</u></p> <p>This should apply only to DU who is not implementing fully pole metering.</p>	

<p>between the EMC service and the consumers' or applicant's premises.</p>		
<p>Article 3.2.19</p> <p>Non-compliance by the DU with any of the foregoing procedures shall result in the relocation of the meters to the required height prescribed under the Magna Carta and the DSOAR.</p>	<p><u>MERALCO</u></p> <p>For deletion. It should be noted that meters are elevated for good and sufficient reason - most times precisely because providing the standard meter installation as prescribed under the DSOAR and Magna Carta is not feasible (for example, the necessary right of way cannot be obtained). Moreover, non-compliance with the procedures laid down in these Rules does not derogate from the fact that there exist conditions that justify, even necessitate, the elevation of the meters. Hence, it would be impractical, at times even impossible, to relocate elevated meters to the standard height.</p> <p><u>DMC</u></p> <p>This Article may be dropped since the penal provision in Article VI – Violation, already specifies the handling of violations of these Rules. In addition, non-compliance with these procedures does not nullify the conditions that justify the elevation of meters.</p>	
<p>Article 4.1 Minimum technical standards</p> <p>DUs shall conform with the minimum technical standards set by law, rules and regulations including the Philippine Electrical Code.</p>	<p><u>AMRECO</u></p> <p>This is highly impossible and impractical to rural areas where most customers are more than 130 meters but are lifeline customer with minimal consumption. System Loss Cap should be returned.</p> <p><u>MERALCO</u></p> <p>The PEC applies to standard connections, while EMC is technically a non-standard connection. Therefore, we suggest that the definition of the application of PEC standard shall mean only to standard connections.</p>	

	<p>We recommend:</p> <p>“DUs shall conform with the applicable minimum technical standards set by law, rules and regulations including the Philippine Electrical Code.”</p>	
<p>Article 4.1.2</p> <p>The DU shall ensure that the service drop wires shall have an adequate capacity for the load contracted by the consumer pursuant to the minimum standard set by Article 2.30.2.3(b) of the Philippine Electrical Code and are well insulated for wear and tear endurance and for protection from possible illegal tapping.</p>	<p><u>MERALCO & DMC</u> Nothing can deter a pilferer even if the wires are well protected.</p> <p><u>Suggested Revision:</u></p> <p>4.1.2 The DU shall ensure that the service drop wires shall have an adequate capacity for the load contracted by the consumer pursuant to the minimum standard set by Article 2.30.2.3(b) of the Philippine Electrical Code and are well insulated for wear and tear endurance.</p>	
<p>Article 4.1.3</p> <p>DUs shall install a system-operated automatic power shut-off in case of fire in the area served by an EMC.</p>	<p><u>PELCO 3</u> Defer this provision for our cooperative cannot provide this type of technology for each of our consumers or areas served by EMC.</p> <p><u>ILPI & SOCOTECO I</u> Unnecessary because the system is already protected by fuse cut-outs located in all transformer stations which will automatically disconnect the system where there are electrical fault in the area.</p> <p><u>BUSECO II</u> This is costly. Automatic power shut-off devices may not be needed because there are protective devices already installed in the</p>	

	<p>households.</p> <p><u>MERALCO & DMC</u></p> <p>A system-operated and automatic power shut-off in case of fire cannot be assured by the DU and will be hard and costly to implement. It is part of the DU's standard operating procedures to send emergency crews to isolate the electric facilities in all fire-affected areas regardless of whether these are served through EMCs or not. Article 4.1.3 is, therefore, no longer necessary.</p>	
<p>Article 4.1.4</p> <p>DUs shall install a safety switch or circuit breaker with a size equal to the capacity of the service drop wires on a meter installed on other elevated service and on meters on EMC-service areas to isolate each meter from the other in case of short circuit or faulty connection at the load side. As such, all safety switches must be accessible to either the DU's personnel, the consumer/s or the consumer/s' appointed representative, in default thereof, a barangay official, provided that such safety switch or circuit breaker must be securely clustered near the EMC frame or secured from pedestrians, in case of a meter installed in other elevated service.</p>	<p><u>BUSECO II</u></p> <p>DU shall not be required to install such devices as long as it can protect the lines from faulty connections within the standards set by law.</p> <p><u>ILPI</u></p> <p>Not necessary because the line side is already protected by fuse cut-outs and by safety switches in the customers houses.</p> <p><u>DAVAO LIGHT</u></p> <p>Who is responsible for replacement in case circuit breakers get lost?</p> <p><u>VECO & COLIGHT</u></p> <p>Delete. Not safe to give others access to one's main circuit breaker.</p> <p><u>MOELCI II</u></p> <p>This provision is already addressed by Art. 4.1.3. Our coop placed cut-out in each transformer serving clustered meters to serve as power shut-off/switch in case of fire.</p>	

	<p><u>RECA I</u></p> <p>We recommend that the size or rating of the circuit breaker shall be in accordance to the provisions of the latest PEC as dictated by the load being protected.</p> <p>It is also security risk.</p> <p><u>MERALCO & SOCOTECO I</u></p> <p>Since as a requirement, the customer will already provide their own respective protection within their premises, we respectfully suggest that this provision be deleted.</p> <p>In addition, a safety switch or circuit breaker accessible to the public may be subject to vandalism and pranks by unscrupulous individuals which may result to unwanted power outage to households.</p> <p><u>DMC</u></p> <p>Costly on the part of the DU.</p> <p>Suggested revision:</p> <p>4.1.4 DUs shall install a safety switch or circuit breaker The cost of the safety switch or circuit breaker shall be borne by the customer.</p>	
<p>Article 4.1.5</p> <p>DUs shall bear the cost arising from any error in connecting the service drop wires from the meter</p>	<p><u>DMC & MERALCO</u></p> <p>The statement may be misinterpreted.</p> <p>Suggested revision:</p>	

<p>in the EMC to the premises of another consumer other than the registered consumer.</p>	<p>4.1.5 DUs shall bear the cost in correcting errors in connecting the service drop wires.....</p>	
<p>Article 5 TECHNICAL LOSSES</p> <p>Line losses on the service drop wires beyond the one hundred thirty (130) meters length shall be borne by the DU. These losses shall be subtracted from the consumer's meter registration for the billing month. For purposes of computing line loss, the DU shall use the formula I^2R, where:</p> <p>I^2 = current flowing on the wires</p> <p>R = resistance of the conductors</p>	<p><u>SOCOTECO I & BUSECO II</u></p> <p>It is the consumer that caused his connection to be elevated.</p> <p>Further, system loss cap is also reduced. If the system loss is passed on to the DU, the system loss is being recovered by the DU through its system loss rate – which in turn passes on the burden of system loss to all consumers regardless of connection standard. If System Loss is beyond the cap, then the DUs are the one paying for the losses.</p> <p><u>DAVAO LIGHT</u></p> <p>How does this relate to Art. 3.2.1?</p> <p><u>COLIGHT</u></p> <p>DU is allowed to pass on losses to the consumers at or below the cap. High losses are primarily caused by pilferage.</p> <p><u>RECA I</u></p> <p>Delete. It is difficult to acquire the current (I) because we need a recording ammeter to get every consumer's average current. Also, energy consumption (kwh) is not reliable to use.</p> <p><u>MERALCO</u></p> <p>Delete. The provision of measuring the system loss beyond the prescribed length of 130 meters per customer is very difficult to implement operationally. However, for service drop beyond the 130</p>	

	<p>meters serving distance, we suggest instead that the DU install the next bigger size of wire, to compensate for the perceivable system loss.</p> <p><u>DMC</u></p> <p>Delete. The technical line loss for those lengths in excess of the maximum 130 meters is negligible.</p>	
--	--	--