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06 June 2003

THE ENERGY REGULATORY COMMISSION
Pacific Center Building
San Miguel Avenue, Ortigas Center
City of Pasig

Attention : ENGR. EDWIN OGENAR
REGULATORY OPERATIONS SERVICE

Subject : ERC CASE NO. 2003-256
PROPOSED GUIDELINES TO GOVERN THE SETTING OF STANDARDS TO
DISTINGUISH THE TRANSMISSION FROM THE SUBTRANSMISSION ASSETS
OF TRANSCO AND THE BUYER OR CONCESSIONAIRE OF SAID ASSETS AND
THE GRANT OF FRANCHISE TO OPERATE THE SUBTRANSMISSION ASSETS

Gentlemen:

Our clients, TARLAC ELECTRIC INCORPORATED and SAN FERNANDO ELECTRIC LIGHT AND POWER CO., INC., hereinafter referred to as TEI and SFELAPCO respectively, respectfully submit their COMMENTS to the proposed guidelines (please refer to letters "B" and "C" of Article III thereof).

"SUBTRANSMISSION ASSETS" have already been defined in detail under Section 4, letter (ww) in R.A. 9136 and likewise under Rule 4, letter (iii), Definition of Terms of the Implementing Rules and Regulations.

Why is there still a need to get/seek the approval of this Honorable Commission for the classification of what is a SUBTRANSMISSION ASSET?

TEI and SFELAPCO, with the kind permission of this Honorable Commission, reserve their right to submit further COMMENTS on or before 12 June 2003 should circumstances warrant the filing of additional comments.

Very respectfully,

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[for the firm]

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