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FOR : ENERGY REGULATORY COMMISSION
RE : ADDITIONAL COMMENTS ON NEW BSUP GUIDELINES
FROM : DECORP
DATE : 22 FEB. 2003

Following are my comments re: Business Separation Guidelines issued by the ERC:

1. Is this guideline only a transitional guideline to full BSUP? Is this meant to usher in the initial implementation and slowly "develop it from within"?
2. The Distribution Business Segments are further subdivided into 6 segments, there are duplication in actual services to be rendered between these segments.
3. The Meter Reading function, which used to be an integral part of billing and collection services, is now transferred to the Metering Business Segment, is this feasible? What charge shall be applied by a distribution utility doing the meter reading for a separate supply entity supplying electricity to the contestable market?
4. The Supply Business Segment shall now be limited only to the contestable market, when and how will the captive market benefit from the full realization of open competition?
5. The BSUP Guidelines need to be thoroughly deliberated based on its practical applicability and its implication to the utilities and the end-users.
6. The BSUP Guidelines is not consistent with the intention and objectives of deregulation.

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