Affidavit of Explanation and Acknowledgment of Responsibility

**1. Personal and Professional Information**

We, the undersigned, are both Energy Traders at PowerSource Philippines Incorporated (PPEI), and are responsible for submitting and monitoring market bids related to the PPEI’s coal plant operations. This includes ensuring that plant output and market bids are aligned with the operational capacity of the plant, as well as monitoring the Market Participants Interface (MPI). We are relatively new to energy trading and this is our first role in the industry. Additionally, the trading department is newly established within the Company. As such, we are still gaining experience and refining our understanding of the market processes.

**2. Background on the Incident**

Our management decided to temporarily shut down the plant scheduled on October 11, 2024. Prior to this decision, a standing bid of 14 MW had been submitted in accordance with the Look Ahead Submission (LAS) protocol. Following the shutdown, we submitted a new standing bid for 0 MW on October 11, 2024, to reflect the plant’s inability to generate power from October 12, 2024, onwards.

However, despite submitting the 0 MW standing bid, the 14 MW bid from the previous standing bid remained in effect. As a result, the new 0 MW bid was not properly reflected in the real-time dispatch (RTD). The market continued to expect 14 MW of generation, even though the plant was unable to produce any power, which led to a breach of the agreed generation schedule.

We did not notice the issue with the RTD until October 13, 2024, when we received a phone call from the System Operator informing us that we had been dispatched to generate 14 MW, despite our plant being shut down. At that point, we realized that the 0 MW standing bid had not been properly reflected in the RTD, leading to the mismatch between our bid and the dispatch expectations.

Please note that in previous shutdowns, we did not submit a working bid (e.g., 0 MW) in order to avoid being dispatched during periods of abnormally high market prices. This time, we also did not submit a working bid, as we were not aware that the latest revision of standing bid will not take effect immediately.

**3. Explanation of the Oversight**

We acknowledge that the breach occurred because we did not submit a working offer for Oct 12, 2024 to reflect 0 MW, and the 0 MW standing bid was not incorporated into the real-time dispatch (RTD) as we had expected. Although the 0 MW standing bid was submitted, the system continued to operate under the previous day's 14 MW standing bid, which was not updated to reflect the plant’s actual shutdown status.

At the time, we assumed that the system would incorporate the updated standing bid of 0MW into the RTD. However, we are unsure whether/r this issue was caused by a system failure or by a misunderstanding of how the market processes and updates standing. We did not fully understand how the system handles such updates, and as a result, the plant’s shutdown status was not properly reflected in the market’s dispatch.

Given our relative inexperience and the fact that previous shutdowns had occurred without a working bid, we did not anticipate that further action beyond updating the standing bid would be necessary this time.

**4. Acknowledgment of Responsibility**

We take full responsibility for the breach and the oversight that led to it. While the standing bid is updated succesfuly, we now recognize that we did not fully understand the market’s handling of standing bids. Our assumption that the system would immediately process and reflect the standing bid was incorrect, and we should have verified that the updated 0 MW bid was accurately reflected in the RTD and submit a working offer otherwise.

We want to clarify that we are uncertain whether the issue was caused by a system failure, a technical issue, or by a lack of understanding of how the system processes standing bids. Regardless of the cause, we take responsibility for not ensuring the bid was properly reflected in the RTD, and we acknowledge that this was an oversight on our part.

**5. Corrective Actions Taken**

In response to the breach, we have implemented the following corrective actions:

Enhanced Monitoring and Verification: We will now closely monitor the MPI platform, particularly during shutdowns, to verify that any updates to the plant’s status and standing bids are accurately reflected in the real-time dispatch.

Training and Knowledge Building: We are actively seeking further training and resources to deepen our understanding of how standing bids are processed in the market. This will allow us to better anticipate potential issues and avoid similar mistakes in the future.

Communication with Market Operator: We have initiated communication with the platform provider or market operator to clarify the processes related to standing bids, particularly during plant shutdowns, and to identify any areas where system processes can be improved.

Updated Internal Procedures: We have revised our internal procedures to ensure that standing bids are always aligned with the actual status of the plant. We will also implement a process for manual verification of standing bids when necessary.

Automated Alert System: We are implementing an automated alert system that will notify us if any standing bid is not properly reflected in the real-time dispatch, ensuring immediate corrective action can be taken if needed.

**6. Conclusion**

We deeply regret the oversight that led to the breach on October 12, 2023, and accept full responsibility for our failure to properly monitor the MPI platform after submitting the 0 MW bid. While the bid was submitted correctly, our incomplete understanding of the market’s handling of standing bids—particularly during plant shutdowns—led to a failure to ensure that the system accurately reflected the updated plant status.

We respectfully request that you take into consideration the context of this breach, which was caused by an uncertainty regarding the platform’s processing of standing bids, rather than negligence or ill intent. We are committed to improving our knowledge and procedures to prevent similar issues in the future.

FURTHER AFFIANTS SAYETH NOT.

Signed:

Arkaengel [Full Name]  
Trader, PowerSource Philippines Incorporated  
Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signed:

Elyson [Full Name]  
Trader, PowerSource Philippines Incorporated  
Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Acknowledgment (if required)  
Subscribed and sworn to before me this \_\_\_\_ day of [Month], 2023.  
[Notary's Name], Notary Public  
[State/Province]  
My commission expires: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_