

Table 7. FIT Differential⁷⁷

RE Plants under the current FIT System, In Mn PhP				
Technology	2012-2023	2024	2025	2026
Biomass	14,217	1,051	2,613	2,195
Hydropower	2,841	1,236	1,883	1,400
Solar	21,916	2,578	3,786	3,606
Wind	38,538	2,974	4,307	4,061
Total	77,513	7,840	12,588	11,263

Again, the 2026 levels are shown only for the purpose of computing the WCA which is discussed below.

58. The final estimated FIT Differential for 2025 in PhP/kWh of REs under the FIT System, inclusive of the effect of the under-recovery for 2024, the accrued FIT Differential for 2014-2015, 2016-2024 generation charged to 2025, plus the provision of FIT Rate Adjustments, are as follows:

Table 8. FIT Differential, In Mn PhP

Particulars	Amount	PhP/kWh
2025 Generation	12,254.85	0.1029
2024 Generation	112.02	0.0009
2023 Generation	3.24	0.0000
2022 Generation	127.75	0.0011
2021 Generation	2.39	0.0000
2020 Generation	598.40	0.0050
2019 Generation	120.29	0.0010
2018 Generation	30.03	0.0003
2017 Generation	29.39	0.0002
2016 Generation	44.11	0.0004
2014 and 2015 Generation	71.89	0.0006
FD Under-recovery	1,886.16	0.0158
Provision for FIT Adjustment	2,172.66	0.0182
Total FIT Differential	17,453.19	0.1466

III. Working Capital Allowance

59. The WCA is part of the FIT-All and serves as buffer to address any default or delay in the collection and/or remittance of the FIT-All and/or Actual Cost Recovery Revenue including, but not limited to, the following:

- Variations between the actual and forecasted (a) RE generation from eligible RE plants resulting from over- and under- generation, (b) Annual National Sales and (c) applicable Forecast Cost Recovery Rates and Actual Cost Recovery Revenues;
- The timing difference of the collection and billing cycle for the FIT-All and Actual Cost Recovery Revenue; and,
- Any other collection or payment shortfall.⁵⁸

60. The WCA amount for collection is expressed as:⁵⁹

$$WCA_{t+1} = (ForecastAnnualPayout_{t+2} \times FactorRate) - WCA_{EndingBalance}$$

Where:

WCA _{t+1}	Is the Working Capital Allowance to be funded during Year _{t+1}
Forecast Annual Payout ¹⁺²	Is the projected amount of payables out of the FIT-All Fund for year _{t+2} consisting of forecasted Total FIT Revenues, forecasted Administration Allowance and forecasted Disbursement Allowance for Year _{t+2} . The forecasted Total FIT Revenues for Year _{t+2} is the sum of the product of the Forecast RE Generation of Eligible RE Plants, for Year _{t+2} multiplied by the appropriate FIT Rate, for Year _{t+2} . The forecasted Administration Allowance for Year _{t+2} is the Administration Allowance for Year _{t+1} , less any non-recurring expenditures such as those relating to the initial filing of the FIT-All, adjusted for forecast CPI for Year _{t+2} . The forecasted Disbursement Allowance for Year _{t+2} is the projected level of payment to the Trustee Bank in Year _{t+2} .
WCA Ending Balance _t	Is the ending balance of the Working Capital Allowance account in Year _t , including any interest income earned in the WCA account and all other component accounts of the FIT-All Fund; if this is not available at the time of filing, the ending balance for the month immediately preceding the month of filing, subject to updating by the ERC of the actual ending balance of the WCA account in Year _t if it shall become available prior to the issuance of its Decision on the FIT-All application.
Factor Rate	Is the factor rate approved by the ERC, upon recommendation of the NREB, reflective of funding requirements of the FIT-All Fund, adjusted by (i) a period factor based on the billing and collection cycle of the Collection Agents as described in the Guidelines; and (ii) the collection efficiencies of Collection Agents. Data for the initial year shall be sourced from Power Sector Assets & Liabilities Management Corporation for its collection of the Universal Charge. Data for succeeding years shall be based on FIT-All historical collection efficiency rate.

61. From the foregoing, it may be gleaned that an initial Forecast Annual Payout for the year 2026 needs to be determined since it is envisioned that buffer requirements for the following year should be collected and built up during the current year. Hence, aside from the 2025 levels for Forecast Cost Recovery Revenue, FIT Differential, Administration Allowance, and Disbursement Allowance, the 2026 projected levels thereof were also established.

62. To compute the WCA, the FCRRs used by TransCo for 2026 were set at the same level as 2025. The same holds true for the FIT Rates.

63. Summarizing Table 6 and Table 7, below are the inputs in computing the Forecast Annual Payout for 2026:

Table 9. 2026 Forecast Cost Recovery Revenue and FIT Differential, In Mn PhP⁶⁰

RE Plants under the FIT System, In Mn PhP		
Technology	Forecast Cost Recovery Revenue	FIT Differential
Biomass	7,394.18	2,195.25
Hydropower	5,366.10	1,400.44
Solar	4,849.60	3,605.87
Wind	5,916.37	4,061.08
Total	23,526.26	11,262.64

64. In addition, FIT Differential back-billings for 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 and 2024 generation amounting to PhP11,957,337.00, PhP1,118,171.32, PhP151,024,407.78, PhP23,134,573.19, PhP580,156,108.99, PhP413,254,167.22, PhP47,325,029.80, PhP25,207,402.62, and PhP29,051,208.60 respectively, are estimated to be billed in 2026 pursuant to Section 4.5 of the REPA.⁶¹

65. The projected Administration Allowance for 2026 is estimated to be PhP15,193,369.60.⁶²

66. For simplicity, the estimated trustee fee or Disbursement Allowance for 2026 is set at the 2025 level of PhP2,530,792.52 as will be discussed below.

67. Combining the results and assumptions given in Paragraphs 63 to 66, the Forecast Annual Payout for 2026 is as follows:

Table 10. 2026 Forecast Annual Payout, In Mn PhP⁶³

Particulars	Amount
Forecast Cost Recovery Revenue	23,526
FIT Differential	12,400
Administration Allowance	15
Disbursement Allowance	3
Forecast Annual Payout	35,944

68. The Guidelines then provide for the use of a Factor Rate that will be multiplied to the Forecast Annual Payout for 2026.

69. Pursuant to the Guidelines, the NREB recommended a formula for the Factor Rate in the 2014-2015 FIT-All Application. Using the same formula for this Application but with updated inputs, a factor rate of 13.6152%⁶⁴ was derived.

70. Further, the Guidelines define the WCA Ending Balance to be the balance of the WCA component account for the immediately preceding month prior to the month of filing. However, TransCo deemed it best to project the level up to year-end 2024 for a more accurate determination.

71. For 2024, the WCA had an ending balance amounting to PhP700.00.⁶⁵

72. From the given information, the combined buffer required for 2025, which is equivalent to the 2026 fund requirement multiplied by the Factor Rate, less the WCA ending balance, is PhP4,893,819,068.28, derived as follows:

Table 11. Determination of WCA, In Mn PhP⁶⁶

Forecast Annual Payout	35,943.78
x Factor Rate	13.6152%
Required WCA	4,893.82
Less: WCA Ending Balance	0.0007
WCA for Funding	4,893.82
Working Capital Allowance, PhP/kWh	0.0411

73. The table above shows the derived PhP/kWh level of the WCA for 2025, which is PhP0.0411/kWh.

IV. Administration and Disbursement Allowance

74. As provided in Section 2.5 of the FIT Rules, the FIT-All shall also take into account the Administrator's administration costs to defray the expenses of the Administrator in connection with the performance of its functions as FIT-All Fund Administrator, i.e., Administration Allowance.

75. For the year 2025, TransCo proposes an Administration Allowance of PhP18,129,857.56 as shown in Annex "L."

76. A similar fee may be imposed by the designated Trustee of the FIT-All Fund in accordance with the Trust Agreement approved by the Honorable Commission to defray standard administrative costs in establishing and managing the actual collection and disbursements of the FIT-All Fund and all other monetary collections authorized by the FIT Rules, i.e., Disbursement Allowance.

77. Based on the Trust Agreement entered into by Land Bank of the Philippines-Trust Group⁶⁷ and TransCo on March 3, 2015⁶⁸ and subsequently approved by the Honorable Commission, LBP is entitled to a fixed fee of PhP720,000.00 per annum plus some variable components.

78. Based on TransCo's estimated FIT-All Fund balance, which is the basis of the major variable component, i.e., the Bangko Sentral ng Pilipinas⁶⁹ supervision fee, the Disbursement Allowance or the service fee of LBP for 2025 amounts to PhP2,530,792.52.⁷⁰

V. FIT-ALL RATE FOR 2025

79. Applying the above components to the formula for FIT-All, the updated FIT-All Rate for 2025 in PhP/kWh is:

$$\begin{aligned} FIT-All &= \frac{FD + WCA + AA + DA}{FNS} \\ &= \frac{0.1466 + 0.0411 + 0.0002 + 0.00002}{0.1879} \\ &= 0.1879 \end{aligned}$$

80. More details on the components and result of the updated FIT-All calculation are presented in the following table:

Table 12. Summary of 2025 Updated FIT-All Rate Computation⁷¹

COMPONENTS	FIT RE PLANTS	RATE (PhP/kWh)	SHARE (%)
FIT DIFFERENTIAL	17,453,186.65	0.1466	78.03%
2025 Generation	12,254,852.98	0.1029	54.79%
2024 Generation	112,016.69	0.0009	0.50%
2023 Generation	3,241.074	0.0000	0.01%
2022 Generation	127,751.245	0.0011	0.57%
2021 Generation	2,390.144	0.0000	0.01%
2020 Generation	598,402.087	0.0050	2.68%
2019 Generation	120,293.922	0.0010	0.54%
2018 Generation	30,028.252	0.0003	0.13%
2017 Generation	29,385.909	0.0002	0.13%
2016 Generation	44,106.209	0.0004	0.20%
2014 and 2015 Generation	71,894.654	0.0006	0.32%
2024 Under (Over) Recovery	1,886,164.269	0.0158	8.43%
Provision for FIT Rate Adjustment	2,172,659.463	0.0182	9.71%
WORKING CAPITAL ALLOWANCE	4,893,819.068	0.0411	21.88%
ADMINISTRATION ALLOWANCE	18,129.858	0.0002	0.08%
DISBURSEMENT ALLOWANCE	2,530,792.52	0.00002	0.01%
Total	22,367,666.583		
FNS, kWh	119,053,190.413		
FIT-All, PhP/kWh	0.1879		

81. The above computed 2025 FIT-All rate is applicable, assuming FIT-All collections of the updated rate commenced in January 2025 billing month.

82. However, as of May 2025 billing month, the FIT-All Fund has already incurred an accumulated deficit of PhP(5,965,175,782.83). Further, if the prevailing FIT-All rate of PhP0.1189/kWh will continuously be implemented and the level of CRR will be at PhP4/kWh until the end of the year, the FIT-All Fund is projected to reach an accumulated deficit of (PhP6,552,424,778.75) by the end of 2025.⁷²

83. It is also estimated that interest payable may reach up to PhP482,535,396.05, in the absence of an upward adjustment on the prevailing FIT-All rate and assuming a CRR rate is at PhP4/kWh.⁷³

84. Given the foregoing, TransCo has computed the Catch-up FIT-All rate of PhP0.3160/kWh to be implemented starting the August 2025 billing period or, alternatively, PhP0.3675/kWh if implemented starting the September 2025 billing period. This is intended to address the fund deficit and avoid further interests payments. Details on the computation of the Catch-up FIT-All rate are shown below:

Table 13. 2025 Catch-Up FIT-All Rate, in PhP/kWh

Billing Month	Reporting Month	Estimated Collection ⁷⁴ PhP11,957,337.00 In Mn PhP	FIT-All Fund Needed ⁷⁵ In Mn PhP	FNS, kWh	Catch-Up FIT-All Rate, PhP/kWh
Jan-25	Mar-25	631.99	22,367.67	119,053.19	0.1879
Feb-25	Apr-25	780.39	21,735.67	109,132.09	0.1992
Mar-25	May-25	922.88	20,935.28	99,210.99	0.2112
Apr-25	Jun-25	1,111.72	20,032.40	89,289.89	0.2244
May-25	Jul-25	1,065.91	18,920.68	79,368.79	0.2384
Jun-25	Aug-25	1,087.80	17,854.77	69,447.69	0.2571
Jul-25	Sep-25	1,089.64	16,766.97	59,526.60	0.2817
Aug-25	Oct-25	1,091.44	15,677.33	49,605.50	0.3160
Sep-25	Nov-25	1,093.21	14,588.89	39,684.40	0.3675
Oct-25	Dec-25	1,091.94	13,492.68	29,763.30	0.4533
Nov-25	Jan-26	1,096.63	12,397.75	19,842.20	0.6248
Dec-25	Feb-26	1,098.29	11,301.12	9,921.10	1.1391

⁷⁴Includes WCA amounting to PhP4.98.

ALLEGATIONS IN SUPPORT OF THE PRAYER FOR PROVISIONAL AUTHORITY

85. TransCo replays the foregoing allegations in so far as they may be applicable.

86. It is respectfully submitted that the computation of, as well as the data used by, TransCo are all in accordance with the FIT Rules and the Guidelines issued by the Honorable Commission.

87. On this basis, TransCo most respectfully moves for the immediate issuance of a provisional authority pursuant to Section 3.74 Rule 14 of the Revised Rules of Practice and Procedure of the Honorable Commission⁷⁶ to allow TransCo to timely implement the FIT-All rate of:

- PhP0.1879/kWh FIT-All rate of FIT RE Plants under the current FIT System, computed based on the FIT-All Guidelines, effective January 2025 billing period;
- Alternatively, the Catch-up FIT-All Rate for 2025 of PhP0.3160/kWh, effective August 2025 billing period, or PhP0.3675/kWh, effective September 2025 billing period, or such Catch-up FIT-All rate depending on the month when the same will be implemented.

88. The grant of a provisional authority will enable TransCo to fulfill its duties and ensure timely payments of the FITs to FIT-eligible RE developers. Conversely, a delay in the approval of the proposed 2025 FIT-All rate and the denial of the prayer for provisional authority will lead to further shortfall in the FIT-All Fund, preventing TransCo to promptly and/or fully pay the actual FIT revenue to eligible RE plants. Further, Section 2.2.8 of the FIT-All Guidelines states that any delayed or partial payment will incur interest which will eventually result in additional charges to end-users.

89. In support of the foregoing allegations in this Application, including those for the issuance of the provisional authority, TransCo hereby submits the Judicial Affidavit of Ms. Rogelyn T. Ronquillo, Manager of TransCo's Regulatory Affairs Department.⁷⁶

PRAYER

WHEREFORE, premises considered, it is most respectfully prayed that this Honorable Commission:

- Pending hearing on the merits of the present Amended Application, **APPROVE** the provisional authority to collect:
 - PhP0.1879/kWh FIT-All rate, effective January 2025 Billing period, computed based on the FIT All Guidelines; or
 - The Catch-up FIT-All rate for 2025 of PhP0.3160/kWh, effective August 2025 billing period, or PhP0.3675/kWh, effective September 2025 billing period, or such Catch-up FIT-All rate depending on the month when the same will be implemented; or
- IN THE ALTERNATIVE**, such FIT-All Rate for 2025 as may be found by the Honorable Commission to be consistent with the FIT-All Guidelines based on new and updated information not available to the Applicant at the time of filing of the present Amended Application.
- DIRECT** the Collection Agents for the FIT-All – DUs, RES, and NGCP, to bill, collect, and remit the FIT-All to the FIT-All Fund, as provided in the FIT-All Guidelines;
- DIRECT** PEMC/IEMOP⁷⁷ to remit the ACRR to the FIT-All Fund as provided in the FIT-All Guidelines;
- After due notice and hearing, **APPROVE** a FIT-All rate of:
 - PhP0.1879/kWh FIT-All rate, effective January 2025 Billing period, computed based on the FIT All Guidelines; or
 - The Catch-up FIT-All rate for 2025 of PhP0.3160/kWh, effective August 2025 billing period, or PhP0.3675/kWh, effective September 2025 billing period, or such Catch-up FIT-All rate depending on the month when the same will be implemented; or
- IN THE ALTERNATIVE**, such FIT-All Rate for 2025 as may be found by the Honorable Commission to be consistent with the FIT-All Guidelines based on new and updated information not available to the Applicant at the time of filing of the present Amended Application.

- EXEMPT** TransCo from payment of permit/supervision fees, if any.
- TransCo also prays for other just and equitable relief.

Quezon City for Paisy City, July 14, 2025.

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Republic of the Philippines)
Quezon City)S.S.

VERIFICATION AND CERTIFICATION AGAINST FORUM SHOPPING

I, Fortunato C. Leynes, Filipino, of legal age, with office address at the National Transmission Corporation ("TransCo"), TransCo Building, Power Center, Senator Miriam P. Defensor-Santiago Avenue (formerly BIR Road) corner Quezon Avenue, Diliman, Quezon City, after having been duly sworn to in accordance with law, do hereby depose and state, that:

- I am the President & CEO of TransCo.
- I am duly authorized to represent TransCo and to execute this Verification and Certification Against Forum Shopping on its behalf, pursuant to Item 12, Subject No. 5.01, Section 5.0 of TransCo's Manual of Approvals. A copy of the Secretary's Certificate and pertinent part of the Manual of Approvals are hereto attached as Annexes "S" and "T" respectively.
- I have caused the preparation of the foregoing Amended Application.
- I have read the foregoing Amended Application and I attest that the allegations therein are true and correct based on my personal knowledge or based on authentic documents. I also attest to the authenticity and veracity of all the documents attached herein.
- I further attest that the foregoing Amended Application is not filed to harass, cause unnecessary delay, or needlessly increase the cost of litigation.
- I also attest that the factual allegations in the foregoing Amended Application have evidentiary support, or if specifically so identified, will likewise have evidentiary support after a reasonable opportunity for discovery.
- I further attest that TransCo has not commenced any action or filed any claim involving the same issues in any court, tribunal, or quasi-judicial agency and, to the best of my knowledge, no such other action or claim is pending therein.
- If I should hereinafter learn that the same or a similar action or claim has been filed or is pending in the Supreme Court, the Court of Appeals or any court, tribunal, or quasi-judicial agency, I shall report said fact within five (5) days from discovery thereof to this Honorable Commission.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my signature this JUL 14 2025 in Quezon City, Philippines.

Fortunato C. Leynes
Affiant

SUBSCRIBED AND SWORN TO before me this JUL 14 2025, at
affiant presenting to me his TransCo ID No. 19128-8, issued in Quezon City on November 17, 2023.

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Book No. 10
Series of 2025.
Notary Public for Quezon City Unit Dec. 31, 2025
Roll No. 19835
PTR No. 19835, 11072025, Q.C.
IBP No. 33161, December 19, 2023
MCLE Comp. No. VII-0009737
A. Venerable
Lawyer, Public, and 1400 Quirino Highway
Brgy. Kaligayahan, Quezon City

¹ Hereafter, "TransCo" or "Applicant."
² Hereafter, "R.A."
³ Hereafter, "EPRA."
⁴ Hereafter, "FIT-All."
⁵ Hereafter, "RE Law."
⁶ RE Law, Sec. 2.
⁷ Hereafter, "FIT."
⁸ Hereafter, "RE."
⁹ See also RE Law IRR, Sec. 5.
¹⁰ Hereafter, "NREB."
¹¹ Hereafter, "FIT Rules."
¹² FIT Rules, Sec. 4.
¹³ Hereafter, "Solar FIT 2."
¹⁴ Hereafter, "Wind FIT 2."
¹⁵ Hereafter, "DOE."
¹⁶ DOE Advisory, Dec. 23, 2020, available at <https://www.doe.gov.ph/sites/default/files/pdf/announcements/FIT-ROR%20Advisory.pdf>.
¹⁷ Hereafter, "WESM."
¹⁸ Hereafter, "FIT-All Guidelines" or "Guidelines."
¹⁹ Paragraphs 21 to 26, which pertain to the Green Energy Auction Program (GEAP), of the original Application dated July 16, 2024 have been deleted, in compliance with the ERC Order dated June 25, 2025. Hence, the succeeding paragraphs are renumbered.
²⁰ FIT Rules, Sec. 2.5.
²¹ Hereafter, collectively, "FIT Rules."
²² Hereafter, "FNS."
²³ Hereafter, "kWh."
²⁴ Guidelines, Sec. 1.4.4.2.
²⁵ Ibid.
²⁶ Copy of the DOE transmittal email dated April 14, 2025 and DOE letter dated April 11, 2025 with attached (i) Actual 2021 to 2023 Electricity Sales and Power Consumption Data (in kWh) and (ii) 2024 Preliminary Data and 2025-2026 Forecast Data for Electricity Sales and Power Consumption Data (in kWh) are attached hereto as Annexes "A" to "A-3," to form an integral part hereof.
²⁷ Hereafter, "CAGR."
²⁸ The document entitled "Computation of Forecast National Sales (FNS) for 2025" is attached hereto as Annex "B," to form an integral part hereof.
²⁹ Guidelines, Sec. 1.4.1.
³⁰ A copy of the DOE transmittal email dated April 21, 2025 and DOE letter dated April 15, 2025, with attachments are hereto attached as Annexes "C" to "C-11" to form an integral part hereof.
³¹ The 2023 to 2022 energy forecast generation per eligible RE plant are summarized in the "List of FIT-Eligible RE Generation Forecast (in MWh) as of June 30, 2023" with attached RE Developers' Submissions, copies of which are attached her