

Table 4. Total FIT Revenue by Technology

Technology	2012-2023	2024	2025	2026	2027
Biomass	50,090	6,692	7,597	9,708	9,717
Hydropower	26,223	6,115	7,137	6,908	6,795
Solar	47,774	6,660	6,552	8,620	8,551
Wind	73,079	7,056	7,782	10,153	10,115
Total	197,166	26,523	29,068	35,389	35,177

### II.3. Forecast Cost Recovery Rate

46. Simply put, the Forecast Cost Recovery Rate<sup>42</sup> is the projected generation rate that the eligible RE plant would likely receive if it were not under the FIT System.

47. Under Section 1.4.1.2 of the Guidelines, how the FCRR is forecasted and applied to a particular eligible RE plant shall be based on whether the eligible RE plant operates in a grid where the WESM is operational or not.

48. The FCRR for the eligible RE plant shall be equivalent to the average of the monthly system Ex-Ante Load Weighted Average Price<sup>43</sup> of the WESM for the Luzon, Visayas and Mindanao Grids for the thirty-six (36) months immediately preceding the filing of the application for the setting of the FIT-All.<sup>44</sup>

49. The FCRR for Mindanao was set using the twenty-eight (28) months Ex-Ante LWAP as the WESM in Mindanao only commenced on January 26, 2023.

50. Consequently, TransCo arrived at the following thirty-six (36)-month averages for Luzon, Visayas and Mindanao:<sup>45</sup>

Table 5. Average LWAP, PhP/kWh

Period	Luzon	Visayas	Mindanao
36 Months	6.0392	6.7403	4.5439
12 Months	4.6175	5.3958	4.0033

51. Multiplying the forecast eligible RE Generation summarized in Table 2 by the appropriate FCRRs (done on a per plant and per month basis), the following total Forecast Cost Recovery Revenue in pesos were derived:

Table 6. Total Forecast Cost Recovery Revenue by Technology, In Mn PhP

Technology	2012-2023	2024	2025	2026	2027
Biomass	35,873	5,640	5,929	7,394	7,402
Hydropower	23,382	4,879	5,925	5,348	5,278
Solar	23,857	4,082	3,726	4,850	4,805
Wind	34,541	4,063	4,592	5,916	5,893
Total	119,653	18,683	20,180	23,508	23,385

Similarly, as for the FIT rates, the 2026 FCRRs were adopted for 2027 because these are merely intended for the determination of the WCA, a buffer fund, as discussed below.

52. **2025 FIT Differential Under-Recovery.** The last term in the formula for FIT Differential is the amount of under-recovery or over-recovery of the FIT Differential. For this instant Application, TransCo has determined a total fund deficit amounting to **PhP1,850,758,640.49**.<sup>46</sup> This is assuming there is no change in the prevailing FIT-All Rate within the year and assuming the market prices for June 2025 to December 2025 are at the level of CRR rates presented in Table 5.

53. **FIT Differential for 2016-2025 generation charged to 2026 FIT-All Rate.** This pertains to the energy generation for the years 2016 to 2025 that are expected to be billed to TransCo in 2026. Section 4.5 of the REPA provides that the eligible RE developer shall only start billing TransCo for FIT Differential upon the REPA's effectivity. Where months have lapsed from the Commercial Operation Date<sup>47</sup> until the Effective Date of REPA, the Actual FIT Differential shall be billed to TransCo over the number of months lapsed from COD to REPA Effective Date.

54. It is estimated that total FIT Differential for 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024 and 2025 generation amounting to **PhP11,957,337.00**, **PhP1,118,171.32**, **PhP151,024,407.78**, **PhP23,134,373.19**, **PhP580,156,108.99**, **PhP413,254,167.22**, **PhP(47,325,029.80)**, **PhP(25,207,402.62)**, **PhP29,051,208.60** and **PhP45,066,426.65** respectively, will be due in 2026.<sup>48</sup>

55. **FIT Differential.** Following the formula for FIT Differential in Paragraph 33 (first two terms), the total Forecast Cost Recovery Revenue in Table 6 is subtracted from the corresponding FIT Revenue in Table 4, on a per plant basis, and yields the following summary for 2021-2027:

Table 7. FIT Differential, In Mn PhP

Technology	2012-2023	2024	2025	2026	2027
Biomass	14,217	1,051	1,668	2,314	2,314
Hydropower	2,841	1,236	1,211	1,560	1,517
Solar	21,916	2,378	2,826	3,771	3,745
Wind	38,538	2,974	3,183	4,237	4,215
Total	77,513	7,840	8,888	11,881	11,792

Again, the 2027 levels are shown only for the purpose of computing the WCA which is discussed below.

56. The final estimated FIT Differential for 2026 in PhP/kWh of REs under the FIT System, inclusive of the effect of the under-recovery for 2025, the accrued FIT Differential for 2016-2025 generation charged to 2026 are as follows:

Table 8. FIT Differential, In Mn PhP

Particulars	Amount	PhP/kWh
2026 Generation	11,881.22	0.0914
2025 Generation	45.07	0.0003
2024 Generation	29.05	0.0002
2023 Generation	(25.21)	(0.0002)
2022 Generation	(47.33)	(0.0004)
2021 Generation	413.25	0.0032
2020 Generation	580.16	0.0045
2019 Generation	23.13	0.0002
2018 Generation	151.02	0.0012
2017 Generation	1.12	0.0000
2016 Generation	11.96	0.0001
2025 Under-recovery	1,850.76	0.0142
Total FIT Differential	14,914.21	0.1147

### III. Working Capital Allowance

57. 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.<sup>49</sup>

58. The WCA amount for collection is expressed as:<sup>50</sup>

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

Where:

WCA <sub>t+1</sub>	Is the Working Capital Allowance to be funded during Year <sub>t+1</sub>
Forecast Annual Payout <sub>t+2</sub>	Is the projected amount of payables out of the FIT-All Fund for Year <sub>t+2</sub> consisting of the forecasted Total FIT Revenues, forecasted Administration Allowance and forecasted Disbursement Allowance for Year <sub>t+2</sub> . The forecasted Total FIT Revenues for Year <sub>t+2</sub> is the sum of the product of the Forecast RE Generation of Eligible RE Plant, for Year <sub>t+2</sub> multiplied by the appropriate FIT Rate, for Year <sub>t+2</sub> . The forecasted Administration Allowance for Year <sub>t+2</sub> is the Administration Allowance for Year <sub>t+1</sub> , less any non-recurring expenditures relating to those relating to the FIT-All application. The forecasted Disbursement Allowance for Year <sub>t+2</sub> is the projected level of payment to the Trustee Bank in Year <sub>t+2</sub> .
WCA Ending Balance <sub>t</sub>	Is the ending balance of the Working Capital Allowance account in Year, 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 of 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, 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 per plant 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.

59. From the foregoing, it may be gleaned that an initial Forecast Annual Payout for the year 2027 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 2026 levels for Forecast Cost Recovery Revenue, FIT Differential, Administration Allowance, and Disbursement Allowance, the 2027 projected levels thereof were also established.

60. To compute the WCA, the FCRRs used by TransCo for 2027 were set at the same level as 2026. The same holds true for the FIT Rates.

61. Summarizing Table 6 and Table 7, below are the inputs in computing the Forecast Annual Payout for 2027:

Table 9. 2027 Forecast Cost Recovery Revenue and FIT Differential, In Mn PhP

Technology	Forecast Cost Recovery Revenue	FIT Differential
Biomass	7,394.18	2,313.69
Hydropower	5,347.56	1,560.08
Solar	4,849.60	3,770.80
Wind	5,916.37	4,236.65
Total	23,507.71	11,881.22

62. In addition, FIT Differential back-billings for 2019, 2020, 2021, 2022, 2023, 2024 and 2025 generation amounting to **PhP4,352,333.85**, **PhP67,317,299.23**, **PhP30,689,639.62**, **PhP(56,793,149.28)**, **PhP(54,094,654.82)**, **PhP26,508,140.65** and **PhP9,810,588.03** respectively, are estimated to be billed in 2027 pursuant to Section 4.5 of the REPA.<sup>51</sup>

63. The projected Administration Allowance for 2027 is estimated to be **PhP15,336,131.66**.<sup>52</sup>

64. For simplicity, the estimated trustee fee or Disbursement Allowance for 2027 is set at the 2026 level of **PhP2,363,753.93** as will be discussed below.

65. Combining the results and assumptions given in Paragraphs 61 to 64, the Forecast Annual Payout for 2027 is as follows:

Particulars	Amount
Forecast Cost Recovery Revenue	23,507.71
FIT Differential	11,881.22
Administration Allowance	15
Disbursement Allowance	2
Forecast Annual Payout	34,922

66. The Guidelines then provide for the use of a Factor Rate that will be multiplied to the Forecast Annual Payout for 2027.

67. 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 11.6692%<sup>53</sup> was derived.

68. 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 2025 for a more accurate determination.

69. For 2025, the WCA is projected to have an ending balance amounting to negative **PhP350,963,823.85**,<sup>54</sup> assuming that the current FIT-All Rate of **PhP0.1189/kWh** will prevail until the end of the year.

70. From the given information, the combined buffer required for 2026, which is equivalent to the 2027 fund requirement multiplied by the Factor Rate, less the WCA ending balance, is **PhP4,426,110,997.90**, derived as follows:

Table 11. Determination of WCA, In Mn PhP

Forecast Annual Payout	34,922.36
x Factor Rate	11.6692%
Portion of Annual Payout	4,075.15
Less: WCA Ending Balance	(350,963.85)
WCA Annual Funding	4,426.11
WCA, PhP/kWh	0.0340

71. The table above shows the derived PhP/kWh level of the WCA for 2026, which is **PhP0.0340/kWh**.

### IV. Administration and Disbursement Allowance

72. 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.

73. For the year 2026, TransCo proposes an Administration Allowance of **PhP15,193,369.60** as shown in Annex "L."

74. 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.

75. Based on the Trust Agreement entered into by Land Bank of the Philippines-Trust Group<sup>55</sup> and TransCo on March 3, 2015<sup>56</sup> and subsequently approved by the Honorable Commission, LBP is entitled to a fixed fee of **PhP720,000.00** per annum plus some variable components.

76. Based on TransCo's estimated FIT-All Fund balance, which is the basis of the major variable component, *i.e.*, the Bangko Sentral ng Pilipinas<sup>57</sup> supervision fee, the Disbursement Allowance or the service fee of LBP for 2026 amounts to **PhP2,363,753.93**.<sup>58</sup>

### V. FIT-ALL RATE FOR 2026

77. Applying the above components to the formula for FIT-All, the FIT-All Rate for 2026 in PhP/kWh is:

$$FIT-All = \frac{FD + WCA + AA + DA}{FNS}$$
$$= \frac{0.1147 + 0.0340 + 0.00012 + 0.00002}{0.1488}$$

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

Table 12. Summary of 2026 FIT-All Rate Computation

COMPONENTS	TOTAL	RATE (PhP/kWh)	SHARE (%)
FIT DIFFERENTIAL	14,914,208.804	0.1147	77.04%
2026 Generation	11,881,220.195	0.0914	61.38%
2025 Generation	45,066.427	0.0003	0.23%
2024 Generation	29,051.209	0.0002	0.15%
2023 Generation	(25,207.403)	(0.0002)	-0.13%
2022 Generation	(47,325.030)	(0.0004)	-0.24%
2021 Generation	413,254.167	0.0032	2.13%
2020 Generation	580,156.109	0.0045	3.00%
2019 Generation	23,134.373	0.0002	0.12%
2018 Generation	151,024.408	0.0012	0.78%
2017 Generation	1,118.171	0.0000	0.01%
2016 Generation	11,957.337	0.0001	0.06%
2025 Under (Over) Recovery	1,850,758.640	0.0142	9.96%
WORKING CAPITAL ALLOWANCE	4,426,110.998	0.0340	22.86%
ADMINISTRATION ALLOWANCE	15,193.370	0.00012	0.08%
DISBURSEMENT ALLOWANCE	2,363,753.93	0.00002	0.01%
Total	19,357,876.926		
FNS, kWh	130,050,728.819	0.1488	

### VI. ALTERNATIVE FIT-ALL RATES FOR 2026

79. TransCo calculated an alternative FIT-All Rate for 2026 using the 12-month average LWAP as follows:

Table 13. Summary of 2026 FIT-All Rate Computation (12-Month Average LWAP)

COMPONENTS	TOTAL	RATE (PhP/kWh)	SHARE (%)
FIT DIFFERENTIAL	22,743,056.982	0.1748	40.19%
2026 Generation	16,757,075.322	0.1289	59.11%
2025 Generation	45,066.427	0.0003	0.16%
2024 Generation	29,051.209	0.0002	0.10%
2023 Generation	(25,207.403)	(0.0002)	-0.09%
2022 Generation	(47,325.030)	(0.0004)	-0.17%
2021 Generation	413,254.167	0.0032	1.46%
2020 Generation	580,156.109	0.0045	2.05%
2019 Generation	23,134.373	0.0002	0.08%
2018 Generation	151,024.408	0.0012	0.53%
2017 Generation	1,118.171	0.0000	0.00%
2016 Generation	11,957.337	0.0001	0.04%
2025 Under (Over) Recovery	4,792,775.072	0.0369	16.91%
WORKING CAPITAL ALLOWANCE	5,598,937.578	0.0431	19.75%
ADMINISTRATION ALLOWANCE	15,193.370	0.00012	0.05%
DISBURSEMENT ALLOWANCE	2,363,753.93	0.00002	0.01%
Total	28,348,953.931		
FNS, kWh	130,050,728.819	0.2180	

80. TransCo also calculated the following FIT-All Rates considering the different levels of market price and the implementation month approval by the ERC:

Table 14. Summary of Alternative FIT-All Rates for 2026

Billing Month	Reporting Month	36 Months LWAP (PhP5.94/kWh)	FIT-ALL RATE, P/kWh (PhP4.70/kWh)	PhP 4/kWh	PhP 3/kWh
Jan-26	Mar-26	0.1488	0.2180	0.2570	0.3130
Feb-26	Apr-26	0.1553	0.2207	0.2731	0.3343
Mar-26	May-26	0.1629	0.2459	0.2927	0.3599
Apr-26	Jun-26	0.1723	0.2645	0.3165	0.3912
May-26	Jul-26	0.1841	0.2878	0.3463	0.4303
Jun-26	Aug-26	0.1991	0.3177	0.3846	0.4806
Jul-26	Sep-26	0.2193	0.3575	0.4356	0.5476
Aug-26	Oct-26	0.2474	0.4070	0.4930	0.6414
Sep-26	Nov-26	0.2897	0.4971	0.6142	0.7822
Oct-26	Dec-26	0.3601	0.6166	0.7928	1.0168
Nov-26	Jan-27	0.5008	0.8431	1.1508	1.4860
Dec-26	Feb-27	0.9234	1.7531	2.2215	2.8935

### ALLEGATIONS IN SUPPORT OF THE PRAYER FOR PROVISIONAL AUTHORITY

81. TransCo repleads the foregoing allegations in so far as they may be applicable.

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

83. On this basis, TransCo most respectfully moves for the immediate issuance of a provisional authority pursuant to Section 3,<sup>59</sup> Rule 14 of the Revised Rules of Practice and Procedure of the Honorable Commission<sup>60</sup> to allow TransCo to timely implement the FIT-All Rate of:

- PhP0.1488/kWh** FIT-All rate of FIT RE Plants under the current FIT System, computed based on the FIT-All Guidelines; OR
- A FIT-All rate of **PhP0.2180/kWh** of FIT RE Plants under the current FIT System using the latest 12-month average LWAP; OR
- A FIT-All Rate depending on the prevailing market price at the time of ERC's evaluation and in the month when the same will be implemented;

84. 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 may lead to possible 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.

85. 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 **Mr. Jayson O. Ranara, Manager of TransCo's FIT-All Fund Administration Division**.<sup>61</sup>

### PRAYER

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

- Pending hearing on the merits of the present Application, the provisional authority to collect the FIT-All at the rate of:
  - PhP0.1488/kWh** FIT-All rate of FIT RE Plants under the current FIT System, computed based on the FIT-All Guidelines, using the latest 36 month average LWAP; OR
  - A FIT-All rate of **PhP0.2180/kWh** of FIT RE Plants under the current FIT System using the latest 12-month average LWAP; OR
  - A FIT-All Rate depending on the prevailing market price at the time of ERC's evaluation and in the month when the same will be implemented; OR
- IN THE ALTERNATIVE**, such FIT-All Rate for 2026 as may be found by the Honorable Commission to be consistent with the FIT-All Guidelines based on new and updated information and/or evidence available at the time of ERC's evaluation of the application BUT not available to the Applicant at the time of filing of the present Application.
- The Collection Agents for the FIT-All – DUs, RES, and NGCP, be directed to bill, collect, and remit the FIT-All to the FIT-All Fund, as provided in the FIT-All Guidelines;
- PEMC/IEMOP<sup>62</sup> be directed to remit the ACRR to the FIT-All Fund as provided in the FIT-All Guidelines;
- A FIT-All Rate of,

4.1 After due notice and hearing, **PhP0.1488/kWh** FIT-All rate of FIT RE Plants under the current FIT System, computed based on the FIT-All Guidelines; OR

### 4.2 IN THE ALTERNATIVE,

- A FIT-All rate of **PhP0.2180/kWh** of FIT RE Plants under the current FIT System using the latest 12-month average LWAP; OR
- A FIT-All Rate depending on the prevailing market price at the time of ERC's evaluation and in the month when the same will be implemented; OR
- Such FIT-All Rate for 2026 as may be found by the Honorable Commission to be consistent with the FIT-All Guidelines based on new and updated information and/or evidence available at the time of ERC's evaluation of the application BUT not available to the Applicant at the time of filing of the present Application.

5. TransCo be exempt from payment of permit/supervision fees, if any.

TransCo also prays for other just and equitable relief.

Quezon City for Pasig City, July 15, 2025.