

REPUBLIC OF THE PHILIPPINES  
**ENERGY REGULATORY COMMISSION**  
PASIG CITY

IN THE MATTER OF THE  
APPLICATION FOR AUTHORITY  
TO DEVELOP AND OWN OR  
OPERATE DEDICATED POINT-TO-  
POINT LIMITED TRANSMISSION  
FACILITIES TO CONNECT THE  
CAPANTOLAN SOLAR POWER  
PROJECT TO THE LUZON POWER  
GRID, WITH PRAYERS FOR  
PROVISIONAL AUTHORITY AND  
CONFIDENTIAL TREATMENT OF  
INFORMATION

ERC Case No. 2026-043 MC

PACIFIC IMPACT ENERGY CORP.,  
*Applicant.*

August 25, 2026

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**APPLICATION FOR AUTHORITY TO DEVELOP AND  
OWN OR OPERATE DEDICATED POINT-TO-POINT  
LIMITED TRANSMISSION FACILITIES  
(with Prayers for Provisional Authority and  
Confidential Treatment of Information)**

Applicant Pacific Impact Energy Corp. ("**PIEC**"), by  
counsel, respectfully states:

**I. The Applicant**

1. PIEC is a generation company ("**GenCo**") duly  
organized and existing under and by virtue of the laws of the  
Republic of the Philippines, with office address at 8<sup>th</sup> Floor,  
One Ayala, East Tower, Edsa cor. Ayala Avenue, San Lorenzo,  
Makati City 1223. It may be served with orders, notices, and  
other processes of this Honorable Commission through  
undersigned counsel at the address indicated below.

2. As stated in its *Amended Articles of Incorporation*, PIEC is authorized “[t]o carry on the general business of generating power, derived from solar, wind, hydro, and other renewable energy resources, through the operation of generation facilities, for power purposes and wholesale of electricity to power companies, distribution utilities, power cooperatives, retail electricity suppliers, and other customers to such extent allowed by applicable laws and regulations \*\*\* [and] to develop, design, acquire, build, construct, commission, maintain, and operate all the necessary and convenient facilities, plants, buildings, equipment, machineries, and substations used in the generation of electricity and facilities used in connection therewith. \*\*\*”<sup>1</sup>

Copies of the documents relating to PIEC’s corporate registration are attached as follows:

| Annex | Document                                                                                                                                                                       |
|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A     | Certificate of Incorporation dated September 21, 2023                                                                                                                          |
| B     | Certificate of Filing of Amended Articles of Incorporation dated February 27, 2025 with attached Amended Articles of Incorporation dated May 15, 2024 (“ <b>Amended AOI</b> ”) |
| C     | Amended General Information Sheet for the period covered May 15, 2025                                                                                                          |

3. On July 19, 2024, the Department of Energy (“**DOE**”) and PIEC executed *Solar Energy Operating Contract No. 2024-06-900* (the “**SEOC**”). The SEOC awarded PIEC the exclusive right to explore, develop, and utilize the solar energy resources in an 72.98-hectare (“**ha**”) parcel of land within the contract area situated in the Municipality of Sual, Pangasinan (the “**Contract Area**”).<sup>2</sup> The SEOC shall govern the development, construction, installation, commissioning and operation of a solar energy system that will generate electrical power.<sup>3</sup>

<sup>1</sup> See PIEC’s Amended AOI (**Annex B**), Primary Purpose, p. 1. *Underscoring supplied.*  
<sup>2</sup> See the SEOC (**Annex G**), Section 4.1 and Annex A.  
<sup>3</sup> See the SEOC (**Annex G**), Section 1.2.

Copies of the documents relating to PIEC’s registration as a GenCo and authority to file this Application are attached as follows:

| Annex | Document                                                                                                    |
|-------|-------------------------------------------------------------------------------------------------------------|
| D     | <i>Environmental Compliance Certificate ("<b>ECC</b>") No. ECC-OL-R01-2025-0361</i> dated December 26, 2025 |
| E     | <i>Certificate of Non-Coverage No. CNC-OL-R01-2026-02-00264</i> dated February 27, 226                      |
| F     | <i>DOE Certificate of Registration No. SEOC 2024-06-900</i> dated July 14, 2024                             |
| G     | The SEOC                                                                                                    |
| H     | <i>Affidavit of Compliance with PGC and PDC (Form No. 4)</i> dated April 21, 2026                           |
| I     | <i>PIEC’s Secretary’s Certificate</i> dated April 21, 2026                                                  |
| J     | <i>Sworn Statement/Manifestation</i> dated April 21, 2025                                                   |

II. Nature of the Application

4. Pursuant to Section 9 of Republic Act No. 9136 or the *Electric Power Industry Reform Act of 2001* (the “**EPIRA**”) and Rule 5, Section 5(a)(i) of the EPIRA’s Implementing Rules and Regulations, a GenCo may develop and own or operate dedicated point-to-point limited transmission facilities that are consistent with the Transmission Development Plan (“**TDP**”), subject to prior authorization by this Honorable Commission.<sup>4</sup>

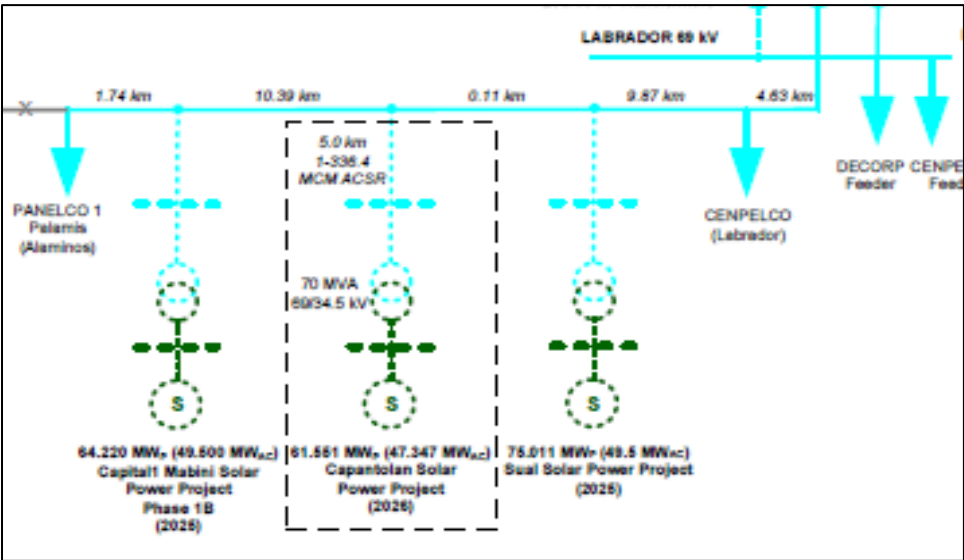
5. In this regard, PIEC has undertaken to construct and own or operate the 61.551-megawatt-peak (“**MW<sub>P</sub>**”)/

<sup>4</sup> SEC. 9. Functions and Responsibilities. – Upon the effectivity of this Act, the TRANSCO shall have the following functions and responsibilities:  
\*\*\*      \*\*\*      \*\*\*

A generation company may develop and own or operate dedicated point-to-point limited transmission facilities that are consistent with the TDP: Provided, That such facilities are required only for the purpose of connecting to the transmission system, and are used solely by the generating facility, subject to prior authorization by the ERC: Provided, further, That in the event that such assets are required for competitive purposes, ownership of the same shall be transferred to the TRANSCO at a fair market price: Provided, finally, That in the case of disagreement on the fair market price, the ERC shall determine the fair market value of the asset.

47.347 MW<sub>AC</sub> Capantolan Solar Power Project (the “**CSPP**”), together with associated ancillary and auxiliary equipment and connection facilities to connect the CSPP to the Luzon Grid. The connection will be through tap connection along the National Grid Corporation of the Philippines’s (“**NGCP’s**”) existing Labrador-Bolinao 69-kilovolt (“**kV**”) transmission line (“**NGCP’s Labrador-Bolinao line**”), which is connected to the NGCP’s Labrador Substation.<sup>5</sup>

6. PIEC is filing this Application to ask for authority to connect the CSPP to the Luzon Grid via a direct connection of the CSPP’s takeoff substation (the “**CSPP Takeoff SS**”) to PIEC’s Caoayan Switching Station (“**PIEC’s Caoayan SS**”). PIEC’s Caoayan SS on the other hand, will be tap-connected along the Labrador-Bolinao line of NGCP’s Labrador Substation,<sup>6</sup> as shown below:



**Figure 1.** Overall Interconnection Scheme of PIEC 47.347 MWAC CSPP<sup>7</sup>

7. The CSPP’s connection to NGCP’s Labrador-Bolinao line, and consequently, the Luzon Grid, shall be referred to as the “**Interconnection Project**”.

**III. Description of the CSPP and Interconnection Project**

<sup>5</sup> See the SIS (**Annex M**), p. 1; see the NGCP SIS Final Report (**Annex M-1**), p. 1.  
<sup>6</sup> See the NGCP FS Final Report (**Annex N-1**), p. 4.  
<sup>7</sup> See the NGCP FS Final Report (**Annex N-1**), p. 6.

A. The CSPP

8. The CSPP is projected to be a 61.551 MW<sub>p</sub>/47.347 MW<sub>AC</sub> ground-mounted solar photovoltaic power generation facility or solar power plant built in Brgy. Capantolan, Municipality of Sual, Pangasinan.

9. The CSPP will be composed of solar panels, inverters, transmission lines, field office, and other ancillary structures.<sup>8</sup> The general information about the CSPP is outlined as follows:<sup>9</sup>

| PIEC CSPP General Information |                                                  |
|-------------------------------|--------------------------------------------------|
| Nature of Project             | Solar power generation                           |
| Total Project Area            | 35.5226 ha                                       |
| Capacity                      | 61.551 MW <sub>dc</sub> /47.347 MW <sub>AC</sub> |
| Transmission line             | 5.5 kilometer (" <b>km</b> ")                    |
| Connection Point Voltage      | 69 kV                                            |

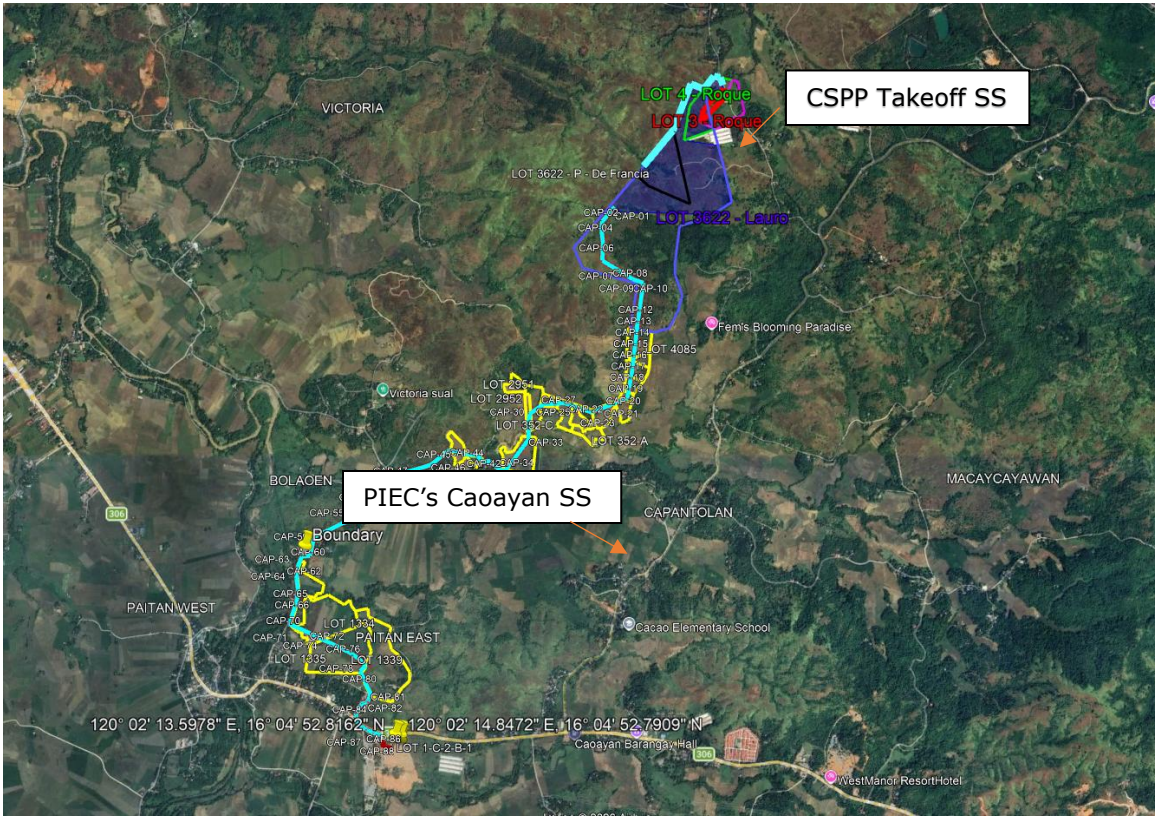
B. The Interconnection Project

10. The CSPP will connect to the Luzon Grid via tap connection along NGCP’s Labrador-Bolinao line, through PIEC’s Caoayan SS (the connection point), approximately 14.61 km from NGCP’s Labrador Substation. The CSPP will have a direct connection to PIEC’s Caoayan SS through a connection line with an approximate length of five (5) km (the "**Transmission Line**").<sup>10</sup>

i. The Transmission Line

11. The Transmission Line shall be a single circuit on steel poles, using 1-336.4 MCM Aluminum Conductor Steel-Reinforced ("**ACSR**")/AS conductors per phase (69 kV SP-SC 1-336.4 MCM ACSR/AS) connecting line.<sup>11</sup> The final route of the Transmission Line is around 95% complete and its approximate route is shown below:

<sup>8</sup> See CSPP’s ECC (**Annex D**), p. 12.  
<sup>9</sup> See CSPP’s ECC (**Annex D**), p. 12.  
<sup>10</sup> See the FS (**Annex N**), p. 1.  
<sup>11</sup> See the FS (**Annex N**), p. 17.



ii. The CSPP Takeoff SS

12. The CSPP Takeoff SS shall be constructed with a radial configuration with a 69-kV Power Circuit Breaker (“**PCB**”), together with its associated two (2) Disconnect Switches (“**DS**”), which are connected to PIEC’s Caoayan SS, and the 50/70 MVA (ONAN/ONAF) 34.5/69 kV power transformer.<sup>12</sup>

iii. PIEC’s Caoayan SS

13. PIEC’s Caoayan SS shall be equipped with a single 69 kV PCB with its associated DS, which connects to the revenue metering system and (2) DS/ESs, which, in turn, connects to the 69 kV Capantolan Solar Power Project-Caoayan connecting line and the other to the tapping or connection point.<sup>13</sup>

IV. The Interconnection Components

<sup>12</sup> See the FS (**Annex N**), p. 7.

<sup>13</sup> See the FS (**Annex N**), p. 7.

A. The CSPP Takeoff SS

14. The CSPP Takeoff SS shall have the following major components:

a. Substation Equipment<sup>14</sup>

| Quantity | Equipment Description                                                       |
|----------|-----------------------------------------------------------------------------|
| 1 (set)  | POWER TRANSFORMER, 70 MVA, 3-phase, 69/34.5 kV, class ONAN Main Transformer |
| 1 (set)  | PCB, 69 kV, 3-phase, 1200A, 25 kA                                           |
| 1 (set)  | DS, 69 kV, 1200A, 25 kA, 3-phase                                            |
| 1 (set)  | DS with Earthing Switch, 69 kV, 1200A, 25 kA, 3-phase                       |
| 3 (each) | Current Transformer, 69 kV, 600:1, multi-ratio, 4-cores                     |
| 3 (each) | Voltage Transformer, 69 kV, capacitive type                                 |
| 6 (each) | Surge Arrester, 60 kV, station type                                         |
| 1 (lot)  | Metal Clad Switchgear, 15kV, complete                                       |
| 1 (set)  | Station Service Transformer, 150 kVA, 34.5kV/230V, 3-phase, dry-type        |
| 1 (set)  | Standby Diesel Generator, 150 kVA, 230V, 3-phase, complete with accessories |

b. Protection System<sup>15</sup>

| Quantity     | Equipment Description                                                                                                                                                                                                                                              |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 (set)      | Main 1: Transformer Protection – Differential Protection (87T)                                                                                                                                                                                                     |
| 1 (set)      | Main 2: Transformer Protection Panel Main 2 - Differential Protection (87T) – different manufacturer                                                                                                                                                               |
| 1 (set each) | Line Protection System <ul style="list-style-type: none"><li>• Main 1: Feeder Protection – Directional Over Current Protection (67/67G)</li><li>• Main 2: Feeder Protection – Directional Over Current Protection (67/67G) (from different manufacturer)</li></ul> |

c. Control and Monitoring Equipment<sup>16</sup>

<sup>14</sup> See the FS (**Annex N**), p. 195.  
<sup>15</sup> See the FS (**Annex N**) p. 195.  
<sup>16</sup> See the FS (**Annex N**) p. 196.

| Quantity | Equipment Description                                       |
|----------|-------------------------------------------------------------|
| 1 (lot)  | Remote Terminal Unit (NO-HMI)                               |
| 1 (lot)  | Main Control Switchboard                                    |
| 1 (lot)  | Closed Circuit Television System (CCTV)                     |
| 1 (lot)  | Access Control and Alarm Monitoring System (ACAMS)          |
| 1 (lot)  | Network Disturbance Monitoring Equipment (NDME)             |
| 1 (lot)  | Fiber Optic Communication System                            |
| 1 (lot)  | VSAT Communication System for Voice and Data Communications |

**B.   PIEC’s Caoayan SS**

15. The major components of PIEC’s Caoayan SS are as follows:

a.   Switching Station Equipment<sup>17</sup>

| Quantity | Equipment Description                                                       |
|----------|-----------------------------------------------------------------------------|
| 1 (set)  | PCB, 69 kV, 3-phase, 1200A, 25 kA                                           |
| 1 (set)  | DS, 69 kV, 1200A, 25 kA, 3-phase                                            |
| 2 (sets) | DS with Earthing Switch, 69 kV, 1200A, 25 kA, 3-phase                       |
| 3 (each) | Current Transformer, 69 kV, 600:1, multi-ratio, 4-cores                     |
| 3 (each) | Voltage Transformer, 69 kV, capacitive type                                 |
| 6 (each) | Surge Arrester, 60 kV, station type                                         |
| 1 (set)  | Station Service Transformer 150 kVA, 13.2kV/230V, 3-phase                   |
| 1 (set)  | Standby Diesel Generator, 150 kVA, 230V, 3-phase, complete with accessories |

b.   Protection System<sup>18</sup>

| Quantity     | Equipment Description                                                                                                                                                                                                                       |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 (set)      | Line Protection System                                                                                                                                                                                                                      |
| 1 (set each) | <ul style="list-style-type: none"><li>• Main 1: Feeder Protection – Directional Over Current Protection (67/67G)</li><li>• Main 2: Feeder Protection – Directional Over Current Protection (67/67G) (from different manufacturer)</li></ul> |

<sup>17</sup> See the FS (**Annex N**) p. 197.  
<sup>18</sup> Main 1 and Main 2 Protection shall be from different manufacturers. See the FS Report (**Annex N**), p. 197.

c. Control and Monitoring Equipment<sup>19</sup>

| Quantity | Equipment Description                              |
|----------|----------------------------------------------------|
| 1 (lot)  | Remote Terminal Unit (NO-HMI)                      |
| 1 (lot)  | Main Control Switchboard                           |
| 1 (lot)  | Closed Circuit Television System (CCTV)            |
| 1 (lot)  | Access Control and Alarm Monitoring System (ACAMS) |
| 1 (lot)  | Network Disturbance Monitoring Equipment (NDME)    |
| 1 (lot)  | Fiber Optic Communication System                   |

C. The Transmission Line

16. The components of the Transmission Line are as follows:<sup>20</sup>

- a. Line structures / Transmission Line Pole
- b. Hardware fittings, Guying, and Anchor Assemblys
- c. Line conductor - 336.4 MCM ACSR and accessories
- d. OPGW and accessories
- e. Insulators
- f. Grounding system

Copies of the documents describing the CSPP and the Interconnection Project, as well as discussing their potential effects, and enumerating the Interconnection Project’s components are attached as follows:

| Annex | Document                                                                                                           |
|-------|--------------------------------------------------------------------------------------------------------------------|
| K     | CSPP’s Project Description                                                                                         |
| L     | CSPP’s Project Rationale                                                                                           |
| M     | PIEC <i>System Impact Study</i> (the “ <b>SIS</b> ”)                                                               |
| M-1   | NGCP <i>System Impact Study Final Report</i> for the CSPP dated January 7, 2025 (“ <b>NGCP SIS Final Report</b> ”) |
| N     | <i>Facilities Study</i> prepared by EAGLEngineering Solutions Corporation dated May 2025 (the “ <b>FS</b> ”)       |

<sup>19</sup> See the FS (**Annex N**) pp. 197 to 198.  
<sup>20</sup> See Contract Price Schedules (**Annex Q**), p. 4.

| Annex | Document                                                                                                     |
|-------|--------------------------------------------------------------------------------------------------------------|
| N-1   | NGCP <i>Facilities Study Final Report</i> for the CSPP dated June 13, 2025 (" <b>NGCP FS Final Report</b> ") |

**V. Statement of Facts**

**A. The connection of the CSPP to the Luzon Grid**

17. The NGCP identified the CSPP as one of the indicative power projects for Luzon in its TDP for 2025 to 2050, herein attached as **Annex O**.<sup>21</sup>

18. Moreover, the Board of Investments ("**BOI**") identified the CSPP as a strategic investment enjoying the green lane issuance of permits and licenses. BOI *Certificate of Endorsement No. OSAC-SI-2025-00055* dated July 8, 2025 for the CSPP is attached as **Annex P**.

19. The NGCP SIS Final Report also provides that the connection of the CSPP to the Luzon Grid is "*acceptable in the likely grid configuration in 2026 and 2031.*"<sup>22</sup>

20. PIEC is currently processing the amendment of its documents to reflect the CSPP’s updated capacity of 50.025 MW<sub>P</sub>/42 MW<sub>AC</sub> and will submit the amended documents once available.

**B. The Interconnection Project’s Construction, Cost, and Technical Information**

21. The CSPP is projected to be completed by December 2026.<sup>23</sup>

22. As outlined in PIEC’s *Contract Price Schedules* dated January 13, 2026 (the "**Detailed Contract Price**")

<sup>21</sup> Appendix 2: Luzon Indicative Power Projects, p. 105.  
<sup>22</sup> See the SIS (**Annex M**), Executive Summary.  
<sup>23</sup> See Project Description (**Annex K**), p. 13.

**Schedules**”), which is covered by the motion for confidential treatment of information below, the total estimated cost of the CSPP is ₱1,584,403,632.07. A copy of the Contract Price Schedules is attached as **Annex Q**.

23. PIEC has engaged China Energy Engineering Group Zhejiang Electric Power Design Institute Co., Ltd. (“**CEEC ZEPDI**”) to design, procure, construct, test, and commission the CSPP.

24. The following table summarizes the Interconnection Project’s relevant dates:<sup>24</sup>

| Activity                                  | Target Start Date | Target Completion Date |
|-------------------------------------------|-------------------|------------------------|
| PV Plant Construction & Pre-commissioning | January 14, 2026  | October 18, 2026       |
| TL Construction                           | July 23, 2026     | October 10, 2026       |
| CSPP Testing and Commissioning            | October 18, 2026  | December 25, 2026      |
| Commercial Operation of the Plant         | December 26, 2026 |                        |

Copies of the documents relating to the design, construction, cost, and technical information of the CSPP and the Interconnection Project are attached as follows:

| Annex    | Document                                                                  |
|----------|---------------------------------------------------------------------------|
| <b>Q</b> | <b>[Confidential]</b> Contract Price Schedules dated January 16, 2026*    |
| <b>R</b> | The Interconnection Project’s detailed SLD                                |
| <b>S</b> | Conceptual Engineering design and drawings of the Interconnection Project |
| <b>T</b> | Gantt chart schedule                                                      |
| <b>U</b> | CSPP Relevant Dates                                                       |
| <b>V</b> | CEEC ZEPDI’s Company Profile                                              |
| <b>W</b> | List of Personnel for Operation and O&M of the Interconnection Project    |

<sup>24</sup> See Gantt chart schedule (**Annex T**).

| Annex | Document                                                          |
|-------|-------------------------------------------------------------------|
| X     | Connection Agreement dated November 5, 2025 between NGCP and PIEC |
| Y     | Historical and Forecasted Supply and Demand Scenario              |

\* Subject of PIEC’s Motion for Confidential Treatment of Information

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

25. Under Rule 14, Section 1 of the *Revised Rules of Practice and Procedure of the Energy Regulatory Commission* (the “**Revised ERC Rules**”), this Honorable Commission is authorized to issue provisional authority or interim relief prior to a final decision, provided that the facts and circumstances alleged warrant such remedy.

26. The facts and circumstances in this Application warrant the issuance by this Honorable Commission of the provisional authority prayed for. Indeed, provisional authority is needed to prevent a delay in the construction of the CSPP. Republic Act No. 9513, otherwise known as the Renewable Energy (“**RE**”) Act of 2008 (the “**RE Act**”), aims to accelerate the development of the country’s renewable energy resources and increase the utilization of renewable energy, thus, it is in the interest of the government to help RE developers such as PIEC achieve commerciality and commence operations at the soonest practicable time.

27. The construction of the Interconnection Project is a prerequisite for the testing and commissioning, and ultimately, the commercial operations of the CSPP. A provisional authority is, thus, urgently needed to enable CSPP to achieve its target commercial operation date and avoid adverse consequences to PIEC.

28. In fact, the RE Act has declared it the policy of the State to “[a]ccelerate the exploration and development of renewable energy resources such as, but not limited to, biomass, solar, wind, hydro, geothermal and ocean energy sources, including hybrid systems, to achieve energy self-reliance, through the adoption of sustainable energy development strategies to reduce the country’s dependence

*on fossil fuels and thereby minimize the country's exposure to price fluctuations in the international markets, the effects of which spiral down to almost all sectors of the economy."*<sup>25</sup>

It is in support of this policy that PIEC was established to generate, transmit, and distribute power derived from solar energy resources.

29. Moreover, the generation of electricity from RE resources, such as solar energy, contributes to the reduction of carbon and greenhouse gas emissions to the atmosphere through lessened usage of power generated from bunker and other fossil fuels.

30. PIEC is one with the DOE's vision of boosting the generation of electricity from renewable sources and reducing the environmental impact brought by the use of traditional fossil fuels. Furthermore, the construction of the CSPP supports the country's RE roadmap and contributes to the DOE's target of achieving a 35% RE share by 2030.<sup>26</sup>

31. The grant of provisional authority will allow PIEC to immediately start construction of the Interconnection Project, thus, preventing any delay in the CSPP's commercial operations.

32. In light of the foregoing, PIEC respectfully submits that there is basis for this Honorable Commission to grant a provisional authority for PIEC to commence the construction of the Interconnection Project.

### **ALLEGATIONS IN SUPPORT OF THE PRAYER FOR CONFIDENTIAL TREATMENT OF INFORMATION**

33. PIEC respectfully requests that the information contained in the Contract Price Schedules (**Annex Q**) be treated as confidential information pursuant to Rule 4 of the Revised ERC Rules.

34. This document should not be disclosed to any other party or third person because the information contained in it

<sup>25</sup> RE Act, Section 2(a); *underscoring supplied*.

<sup>26</sup> See Project Description (**Annex K**), p. 13.

is confidential and proprietary to PIEC. PIEC has an actual and valuable proprietary interest in protecting the information contained in this document, which is not generally available to the public. These details are part of PIEC's competitive advantage in the power generation industry with an economic value (actual or potential) derived from not being generally known to, and not being readily ascertainable by, other persons such as PIEC's competitors, who can obtain economic value from the disclosure of the information, to the detriment of PIEC.

35. This document pertains to sensitive information regarding the cost breakdown of the construction of the CSPP and its components, including the Interconnection Project, which, if disclosed to the public, might adversely affect the competitiveness of PIEC in future projects. Furthermore, the information contained in this document is in possession of this Honorable Commission only on a confidential basis and has not been declared as non-confidential in any previous decision or policies by the Commission.

36. Considering the foregoing, PIEC hereby respectfully asks that the Contract Price Schedules (**Annex Q**) containing the detailed cost estimate of the CSPP be treated as confidential information during the pendency of this Application and any time thereafter, and that it be used solely for the purpose of evaluating this Application. PIEC also respectfully moves that this document be the subject of a Protective Order pursuant to Rule 4, Section 2 of the Revised ERC Rules.

37. Accordingly, PIEC hereby submits one (1) copy of the Contract Price Schedules (**Annex Q**) in a sealed envelope, with the envelope and each page of the document marked with the word "*Confidential*."

**PRAYER**

WHEREFORE, in view of the foregoing, PIEC respectfully prays that this Honorable Commission:

(a) Upon initial review of the Application and pending trial on the merits, GRANT PIEC PROVISIONAL AUTHORITY to develop and own or operate the Interconnection Project;

(b) After trial on the merits, GRANT PIEC PERMANENT AUTHORITY to develop and own or operate the Interconnection Project;

(c) DECLARE the Contract Price Schedules (**Annex Q**) as CONFIDENTIAL INFORMATION within the purview of Rule 4 of the Revised ERC Rules; and

(d) ISSUE A PROTECTIVE ORDER treating the Contract Price Schedules (**Annex Q**) as confidential information pursuant to Rule 4, Section 2 of the Revised ERC Rules and prescribing the guidelines for the protection thereof.

Other just and equitable reliefs are likewise prayed for.

Makati City for Pasig City, August 5, 2026.

*[Gatmaytan Yap Patacsil Gutierrez & Protacio...]*

**GATMAYTAN YAP PATACSIL  
GUTIERREZ & PROTACIO**

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By:

A black rectangular box with a large 'X' drawn over it, indicating a redacted signature.

PTR No. 10766212; 1/05/2026; Makati City  
IBP No. 536377; 12/26/2025;  
Makati Chapter

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