



DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
KAGAWARAN NG KAPALIGIRAN AT LIKAS YAMAN



MEMORANDUM

TO : THE REGIONAL EXECUTIVE DIRECTORS
Regions IX, X, XI, XII and XIII

FROM : THE UNDERSECRETARY
Field Operations - Mindanao

SUBJECT : REQUEST OF THE NATIONAL POWER CORPORATION (NPC)
TO SECURE CERTIFICATE OF APPLICATION UPON
SUBMISSION OF APPLICATION FOR RELEVANT TENURIAL
INSTRUMENTS AS PART OF REQUIREMENTS FOR SECURING
ENVIRONMENTAL COMPLIANCE CERTIFICATE (ECC)

DATE : 15 DEC 2023

This refers to the Memorandum dated 07 December 2023 from the Undersecretary for Finance, Information Systems, and Climate Change with reference to the letter dated 05 December 2023 from the OIC Assistant Secretary for Field Operations – Western Mindanao and FMB Director, in concurrent capacity in response to the National Power Corporation's (NPC) letter dated 03 August 2023 addressed to the DENR Secretary.

NPC's letter includes their request to secure Certificate of Application (CA) upon submission of application for relevant tenurial instruments as part of requirements (to be considered as proof of authority of the proponent over the project area) for securing Environmental Compliance (ECC). The OIC Assistant Secretary for Field Operations – Western Mindanao and concurrent FMB Director clarified on his response-letter that an EMB Memorandum from the Central Office has been issued, stating that "*no ECC shall be issued without an approved tenurial instrument*".

Anent the above, you are advised to provide the necessary assistance to the NPC as they apply for appropriate tenurial instruments, which is a requirement in securing their ECC. Furnish your respective Assistant Secretaries for Field Operations in Mindanao of reports on any coordination/assistance given to NPC relative to the subject matter for their monitoring, copy furnished this Office.

For information and appropriate action.


JOSELIN MARCUS E. FRAGADA, CESO III

Copy Furnished:

- Office of the Secretary
- The Undersecretary for Finance, Information Systems, and Climate Change
- The Assistant Secretary for Field Operations – Western Mindanao
- The Assistant Secretary for Field Operations – Eastern Mindanao

Visayas Avenue, Diliman, Quezon City 1100, Philippines

www.denr.gov.ph

MEMO NO. 2023 - 1076



DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
KAGAWARAN NG KAPALIGIRAN AT LIKAS NA YAMAN



TO : **THE UNDERSECRETARY**
Field Operations - Luzon, Visayas and Environment

THE UNDERSECRETARY
Field Operations-Mindanao

FROM : **THE UNDERSECRETARY**
Finance, Information Systems, and Climate Change

SUBJECT : **REQUEST OF THE NATIONAL POWER CORPORATION (NPC)**
TO SECURE CERTIFICATE OF APPLICATION UPON
SUBMISSION OF APPLICATION FOR RELEVANT TENURIAL
INSTRUMENTS AS PART OF REQUIREMENTS FOR
SECURING ENVIRONMENTAL COMPLIANCE CERTIFICATE
(ECC)

DATE : 07 December 2023

This is in reference to the letter dated 05 December 2023 from the OIC Assistant Secretary for Field Operations -Western Mindanao and Director, in concurrent capacity in response to the National Power Corporation's (NPC) letter dated 03 August 2023 addressed to the DENR Secretary.

NPC's letter includes NPC's request to secure Certificate of Application (CA) upon submission of application for relevant tenurial instruments as part of requirements (to be considered as proof of authority of the proponent over the project area) for securing Environmental Compliance Certificate (ECC). The OIC Assistant Secretary for Field Operations clarified on his response-letter that an EMB Memorandum has been issued stating that "*no ECC shall be issued without an approved tenurial instrument*".

May we refer NPC's request to your office for your consideration.


ATTY. ANALIZA REBUELTA – TEH



OUFISCC <ouart.denr20@gmail.com>

D-41624- Request of the National Power Corporation (NPC) to securer Certificate of Application upon submission of application for relevant tenurial instruments as p[art of requirements for securing Environmental Compliance Certificate (ECC)

1 message

OD Records Unit <records@fmb.denr.gov.ph>

5 December 2023 at 16:52

To: fmyroxas@napocor.gov.ph

Cc: ouart.denr20@gmail.com, "Undersecretary for Policy, Planning and International Affairs" <ouppia@denr.gov.ph>, Undersecretary for Field Operations and Environment <officeofuseccuna@denr.gov.ph>, "Hon. Fragada" <ousecfragada@gmail.com>, Records Management Division <rmdd@denr.gov.ph>, FRMD Forest Resources Management Division <frmd@fmb.denr.gov.ph>, FRMD-FLUAS Forest Land Use and Allocation Section <frmd.fluas@fmb.denr.gov.ph>, Ildefonso Quillooy <ilquillooy@fmb.denr.gov.ph>, Amie Rabang <arabang@fmb.denr.gov.ph>

Sir

Good day

Please find attached file RE: Response to your letter dated August 3, 2023 regarding the above-mentioned subject

Thank you



Records Unit

Forest Management Bureau

Phone : (63-2) 8925-2141

Email Address : fmb@denr.gov.ph



"DISCLAIMER: This email is intended only for the person(s) named in the message header. Unless otherwise indicated, it contains information that is confidential, privileged and/or exempt from disclosure under applicable law. If you have received this message in error; please notify the sender of the error and delete the message. Furthermore, views and opinions expressed herein are those of the sender and do not necessarily reflect the views of the Forest Management Bureau."

FERNANDO MARTIN Y. ROXAS- NPC- 12-05-23.pdf
4111K



Republic of the Philippines
Department of Environment and Natural Resources
FOREST MANAGEMENT BUREAU
Visayas, Avenue, Diliman, 1100 Quezon City
Tel. No.: (632) 8925-2141 / (632) 8927-4788
E-mail Address: fmb@denr.gov.ph Website: <https://www.forestry.denr.gov.ph>

DEC 05 2023

DEC 05 2023

MR. FERNANDO MARTIN Y. ROXAS
President and CEO
National Power Corporation (NPC)
BIR Road cor. Quezon Avenue, Diliman, Quezon City

Dear Mr. Roxas,

This refers to your letter addressed to the DENR Secretary dated 03 August 2023 and the same letter was subsequently referred to this Bureau by the Office of the Undersecretary for Finance, Information Systems and Climate Change per memorandum dated 18 October 2023. It is well to note that the letter contains the NPC's concerns on its request to secure Certificate of Application (CA) upon submission of application for relevant tenurial instruments as part of requirements for securing Environmental Compliance Certificate (ECC).

With that, this Bureau would like to inform NPC that as to the issuance of ECC, the EMB Central Office has issued a memorandum to all EMB Regional Directors dated 08 June 2018 manifesting that "no ECC shall be issued without an approved tenurial instrument", wherein the tenurial instrument shall serve as proof of authority of the proponent over the project area (copy attached).

In view thereof, as to the request for CA, it is suggested that the NPC should directly coordinate with the DENR CENRO or Implementing PENRO where its applications for tenurial instruments were filed/submitted.

We hope that your concern was appropriately addressed with the preceding information and insights provided for the purpose.

Thank you.

Very truly yours,

ARDEIGH J. ADORABLE, CESO III
*OIC Assistant Secretary for Field Operations –
Western Mindanao and Director, in concurrent capacity*

Cc: *The Undersecretary for Finance, Information Systems and Climate Change
The Undersecretary for Policy, Planning and International Affairs
The Undersecretary for Field Operations - Luzon, Visayas and Environment
The Undersecretary for Field Operations - Mindanao*



Republic of the Philippines
Department of Environment and Natural Resources
ENVIRONMENTAL MANAGEMENT BUREAU
DENR Compound, Visayas Avenue, Davao City 8116
Telephone Nos: (032)927-15-17, 928-37-25, Fax No: (032)928-72-53
Website: <http://denrEMB.gov.ph> | Email: emb@denr.gov.ph

MEMORANDUM

TO : ALL EMB REGIONAL DIRECTORS

FROM : THE OIC ASSISTANT DIRECTOR
THE OFFICER-IN-CHARGE, OFFICE OF THE DIRECTOR

SUBJECT : REQUIREMENT OF APPROVED TENURIAL INSTRUMENTS
PRIOR TO ECC ISSUANCE

DATE : JUN 06 2018

To effectively implement Presidential Decree 1586, or the Philippine Environmental Impact Statement System and to harmonize prevailing policies for tenurial instruments, no ECC shall be issued without an approved tenurial instrument. The tenurial instrument shall serve as proof of authority of the proponent over the project area. This among others includes Foreshore Lease Agreement (FLA), Forest Land Use Agreement (FLAG), Forest Land Use Agreement for Tourism (FLAGT), and Integrated Forest Management Agreement (IFMA).

For projects that would require Special Use Agreement for Protected Areas (SAPA), DAO 2007-17 shall apply. The ECC shall be a requirement for SAPA application.

For your strict compliance.


ENGR. VIZMINDA A. OSORIO

Department of Environment and
Natural Resources
ENVIRONMENTAL MANAGEMENT BUREAU
Office of the Director

Memo 2018
JUN 06 2018
11:04:00 AM



**DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
KAGAWARAN NG KAPALIGIRAN AT LIKAS YAMAN**

MEMORANDUM

TO : THE OIC-ASSISTANT SECRETARY FOR FIELD OPERATIONS
AND FOREST MANAGEMENT BUREAU (FMB) DIRECTOR
IN CONCURRENT CAPACITY

THE ASSISTANT SECRETARY AND
BIODIVERSITY MANAGEMENT BUREAU (BMB) DIRECTOR
IN CONCURRENT CAPACITY

THE ASSISTANT SECRETARY AND
ENVIRONMENTAL MANAGEMENT BUREAU (EMB) DIRECTOR
IN CONCURRENT CAPACITY

ALL REGIONAL EXECUTIVE DIRECTORS
DENR Regional Offices

FROM : THE UNDERSECRETARY
Finance, Information Systems and Climate Change

SUBJECT : REQUEST OF THE NATIONAL POWER CORPORATION (NPC) TO
SECURE CERTIFICATE OF APPLICATION UPON SUBMISSION
OF APPLICATION FOR RELEVANT TENURIAL INSTRUMENTS AS
PART OF REQUIREMENTS FOR SECURING ENVIRONMENTAL
COMPLIANCE CERTIFICATE (ECC)

DATE : 18 October 2023

This refers to the letter dated 03 August 2023 of Mr. Fernando Martin Y. Roxas, President and CEO of the National Power Corporation (NPC), addressed to Secretary Maria Antonia Yulo Loyzaga, which we received on 16 August 2023. Said letter pertains to their pending applications for tenurial rights, licensing/ permitting and other compliances for the implementation of Small Power Utilities Group (SPUG) projects.

One of the concerns raised by the NPC is regarding the long process of securing tenurial instruments as a requirement for the application for Environmental Compliance Certificate (ECC). To facilitate the implementation of power-related projects, the NPC requests that they be issued a Certificate of Application upon submission of application for the relevant tenurial instruments:

1. Special Use Agreement in Protected Areas (SAPA) from BMB; and
2. Forest Land use Agreement (FLAG) and Special Land Use Permit (SLUP) from the REDs.

Attached herein is the list of both existing and yet-to-be filed NPC's tenurial instrument applications, for your information and reference.

May we request your Offices to coordinate directly with NPC on how to best proceed with their applications, subject to existing laws, rules and regulations. Kindly provide this Office with updates regarding the matter for monitoring purposes.


ATTY. ANALIZA REBUelta-TEH

CC : **THE UNDERSECRETARY**
Policy, Planning and International Affairs

THE UNDERSECRETARY
Field Operations - Luzon, Visayas and Environment

THE UNDERSECRETARY
Field Operations - Mindanao

THE UNDERSECRETARY
Special Concerns and Legislative Affairs

MR. FERNANDO MARTIN Y. ROXAS
President and CEO
National Power Corporation (NPC)
NPC Building, Quezon Ave, corner BIR Road
Diliman, Quezon City

A. LIST OF PROJECTS WITH FILED TENURIAL INSTRUMENTS TO DENR / MENRE

PROJECT	LOCATION	TENURIAL INSTRUMENT	DATE APPLIED	REMARKS	
PROJECT IMPLEMENTATION CLUSTER – A (PIC-A)					
PALAWAN					
1	Panlaitan DPP	Busuanga, Palawan	NCIP Permit	Nov. 2021	For finalization of schedule of field-based validation.
2	Cabugao DPP	Coron, Palawan			
3	Bulalacao DPP	Coron, Palawan			
4	Maroyogroy og DPP	Linapacan, Palawan	SLUP	Letter of intent for application of SLUP forwarded to CENRO last 11 July 2023	NPC and DENR personnel conducted site inspection and assessment last 22-24 August 2023
5	Pical DPP	Linapacan, Palawan			
6	Galoc DPP	Culion, Palawan			
7	Maracañao DPP	Cuyo, Palawan			
8	Green Island DPP	Roxas, Palawan			
CATANDUANES					
1	San Miguel – Viga 69kV T/L	Catanduanes	SAPA	29 Jul. 2022	Signed SAPA by NPC was forwarded to BMB on 06 Sep. 2023. As per latest coordination with BMB, the SAPA is now forwarded to Usec. Adobo for evaluation.
PROJECT IMPLEMENTATION CLUSTER – B (PIC-B)					
BATANES					
1	Sabtang Solar	Sabtang, Batanes	NCIP/DENR	Aug. 2022	MOA was presented to the ManCom on 12 Sep. 2023. It was recommended for approval and

2	Itbayat Solar	Itbayat, Batanes	NCIP/DENR		signature of the NPC's President and CEO. For issuance of Certificate of Pre-Condition upon finalization of the MOA.
PROJECT IMPLEMENTATION CLUSTER - C (PIC-C)					
ZAMBOANGA DEL SUR (DENR)					
1	Tigtabon DPP	Zamboanga City, Zamboanga del Sur	FLAg	28 Jan. 2021 - Application Submitted 15 Mar. 2022 - Submitted additional requirements	Submitted the additional requirements on 17 Apr. 2023 for the FLAg application. Awaiting the release of the approved FLAg application.
TAWI-TAWI (BARM - MENRE)					
1	Taganak DPP	Turtle Island, Tawi-Tawi	SAPA	22 Oct. 2021	Ongoing review by the new PAMB Chairman of Turtle Island.
OPERATIONS PROJECT DIVISION (OPD)					
BOHOL					
1	Hingotanan DPP	Bien Unido, Bohol	FLAg	For submission of revised application form within Sep. 2023	FLAg application was submitted on 01 Dec. 2022. But on 14 Aug. 2023, CENRO-Talibon. advised NPC to revise the FLAg application form. The revised form is now endorsed for approval of the
2	Malingin DPP	Bien Unido, Bohol	FLAg		
3	Maomawan DPP	Bien Unido, Bohol	FLAg		

4	Sagasa DPP	Bien Unido, Bohol	FLAg		NPC's President and CEO.
5	Gaus DPP	Pres. Carlos P. Garcia, Bohol	FLAg	13 Apr. 2023	Ongoing review of FLAg Application by CENRO-Talibon

**B. LIST OF PROJECTS FOR FILING OF TENURIAL INSTRUMENTS TO DENR/
MENRE**

PROJECT	LOCATION	TENURIAL INSTRUM ENT	DATE APPLIED	REMARKS
PROJECT IMPLEMENTATION CLUSTER - A (PIC-A)				
MASBATE				
1	Jintotolo Island DPP	Balud, Masbate	SLUP	Ongoing preparation of supporting documents for the SLUP Application
2	Gilotongan Island Solar	Cawayan, Masbate	SLUP	
3	Naro Island Solar	Cawayan, Masbate	SLUP	
4	Pefia Island Solar	Cawayan, Masbate	SLUP	
5	Bugtong Island Solar	Pio V. Corpuz, Masbate	SLUP	For application within 1st semester of 2024
6	Chico Island Solar	Cawayan, Masbate	SLUP	
7	Cobre Island Solar	Cawayan, Masbate	SLUP	
8	Guinluthang an Island Solar	Milagros, Masbate	SLUP	For application within 1st semester of 2024
9	Magcaraguit Island Solar	Dimasalang, Masbate	SLUP	
10	Nagarao Island Solar	Placer, Masbate	SLUP	

4	Sagasa DPP	Bien Unido, Bohol	FLAg		NPC's President and CEO.
5	Gaus DPP	Pres. Carlos P. Garcia, Bohol	FLAg	13 Apr. 2023	Ongoing review of FLAg Application by CENRO-Talibon

B. LIST OF PROJECTS FOR FILING OF TENURIAL INSTRUMENTS TO DENR/MENRE

PROJECT	LOCATION	TENURIAL INSTRUMENT	DATE APPLIED	REMARKS
PROJECT IMPLEMENTATION CLUSTER - A (PIC-A)				
MASBATE				
1	Jintoto Island DPP	Balud, Masbate	SLUP	Ongoing preparation of supporting documents for the SLUP Application
2	Gilotongan Island Solar	Cawayan, Masbate	SLUP	
3	Naro Island Solar	Cawayan, Masbate	SLUP	
4	Pefia Island Solar	Cawayan, Masbate	SLUP	
5	Bugtong Island Solar	Pio V. Corpuz, Masbate	SLUP	For application within 1st semester of 2024
6	Chico Island Solar	Cawayan, Masbate	SLUP	
7	Cobre Island Solar	Cawayan, Masbate	SLUP	
8	Guinluthangan Island Solar	Milagros, Masbate	SLUP	For application within 1st semester of 2024
9	Magcaraguit Island Solar	Dimasalang, Masbate	SLUP	
10	Nagarao Island Solar	Placer, Masbate	SLUP	

OPERATIONS PROJECT DIVISION (OPD)						
BOHOL						
1	Sibutu Solar	Sibutu, Tawi-Tawi	Flag	For application within 4th quarter of 2023	Ongoing preparation of supporting documents for the Flag Application	
2	Baldatal DPP	Baldatal, Sapa-Sapa, Tawi-Tawi	Flag	For application within 1st semester of 2023	For preparation of supporting documents for the Flag Application	
BOHOL						
1	Bilangbilang an DPP	Bien Unido, Bohol	SLUP/FLA 9	For FLAG application within 4th quarter of 2023	SLUP valid until 05 Jul. 2024. For FLAG Application before expiry of SLUP.	
CEBU						
1	Kinatarcan Solar (Gintarcan)	Bantayan, Cebu	PAMB/SAP A	For PAMB / SAPA Application within 4th quarter of 2023	Ongoing coordination with PAMB/DENR and gathering of supporting documents for the SAPA Application	
GUIMARAS						
1	Guiwanon Solar	Nueva Valencia, Guimaras	SLUP	For application within 4th quarter of 2023	Ongoing preparation of supporting documents for the SLUP application	
SAMAR						
1	Bagongon Solar	Catbalogan City, Samar	SLUP	For application within 4th quarter of 2023	Ongoing preparation of supporting documents for the SLUP application	

C. LIST OF PROJECTS WITH SLUP AND FOR CONVERSION TO FLAG

PROJECT	LOCATION	TENURIAL INSTRUMENT	DATE APPLIED	REMARKS
OFFICE OF THE LEGAL COUNSEL – LAND AND LAND RIGHTS				
BOHOL				
1	Bagongbanwa DPP	Bagongbanwa Island, Tubigon, Bohol	FLAg	For application within 1st semester of 2024
2	Ubay DPP	Ubay, Tubigon, Bohol	FLAg	
3	Pangapasan DPP	Pangapasan, Tubigon, Bohol	FLAg	
4	Bilangbilangan DPP	Bilangbilangan, Tubigon, Bohol	FLAg	
5	Mantatao DPP	Mantatao, Calape, Bohol	FLAg	
				SLUP Permit No. R7-2021-09 issued on 10 November 2021; For preparation of documents for conversion to FLAG
				SLUP Permit No. R7-2021-12 issued on 10 November 2021; For preparation of documents for conversion to FLAG
				SLUP Permit No. R7-2021-11 issued on 10 November 2021; For preparation of documents for conversion to FLAG
				SLUP Permit No. R7-2021-10 issued on 10 November 2021; For preparation of documents for conversion to FLAG
				SLUP Permit No. R7-2022-01 issued on 02 June 2022; For preparation of documents for

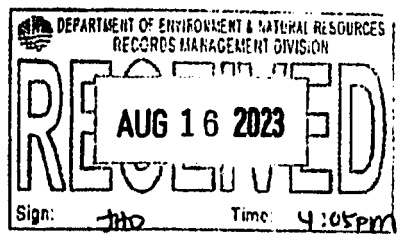
					conversion to FLAG
6	Balicasag DPP	Balicasag, Panglao, Bohol	FLAG		SLUP Permit No. R7-2023-02 issued on 16 May 2023; For preparation of documents for conversion to FLAG
SURIGAO DEL NORTE					
1	Hikdop DPP	Buenavista, Surigao del Norte	FLAG	For application within 2 nd quarter of 2024	SLUP Permit No. RXIII-03-2023 issued on 31 March 2023; For preparation of documents for conversion to FLAG
CAMARINES NORTE					
1	Calaguas DPP	Calaguas Island, Vinzon, Camarines Norte	FLAG	For application within 2 nd quarter of 2024	SLUP Permit No. R5CAMNORTE-2023-02 issued on 18 July 2023; For preparation of documents for conversion to FLAG



NATIONAL POWER CORPORATION

3 August 2023

Hon. MARIA ANTONIA YULO-LOYZAGA
Secretary
Department of Environment & Natural Resources
Visayas Avenue, Diliman, Quezon City



THRU: Undersecretary ANALIZA REBUelta-TEH
Finance, Info Systems and Climate Change
DENR Representative to NPC Board

Undersecretary IGNATIUS LOYOLA A. RODRIGUEZ
Special Concerns and Legislative Affairs
DENR Alternate Representative to NPC Board

SUBJECT: NPC-DENR COORDINATION MEETING ON PENDING APPLICATIONS FOR TENURIAL RIGHTS, LICENSING/ PERMITTING CONCERNS AND OTHER COMPLIANCES

Dear Secretary Yulo-Loyzaga:

The National Power Corporation (NPC) expresses its appreciation for the invaluable assistance rendered by the Department of Environment and Natural Resources (DENR), through its representatives, headed by Usec. Analiza Rebuelta-Teh and the Regional officials of DENR and EMB during the 28 July 2023 meeting on various NPC concerns.

NPC and DENR identified feasible solutions and reached significant agreements to resolve issues affecting NPC's tenurial applications, ECC requirements, water discharge permits, and other environmental compliances. Summarized below are the concerns and key agreements/proposals reached during the said meeting:

Concerns	Agreements/Proposals
1. Request to streamline and standardize the requirement for the issuance of Certificate of Land Classification	DENR-Head Office to issue a Memorandum for the standardization of requirements.
2. DENR's imposition of Annual Fees instead of Development Fee which is the subject of NPC's request for exemption from fees and charges per letter dated 9 December 2021	Information was relayed that the DENR-HO through its LAHRLA issued a legal opinion finding that 1) NPC is not exempted from payment of SAPA User Fee or Development Fees; 2) one-time payment of Annual Fee under DAO 2019-05 is not applicable to NPC and 3) there is no legal basis to exclude the value of the improvements in the computation of User Fee or Development Fee due from NPC.



NATIONAL POWER CORPORATION
BIR Road cor. Quezon Avenue, Diliman
Quezon City 1100, Philippines
Tel. Nos. (832) 8921-3541 to 80 • Fax No. (832) 8921-2468
Website: www.napccor.gov.ph



	NPC seeks reconsideration or appeal on the said legal opinion.
3. The requirement for SLUP conversion to FLAg and Site Expansion to be consolidated to avoid duplicity of submission	<p>The SLUP conversion to FLAg is not an automatic conversion. NPC still has to apply for FLAG and may include the additional area for site expansion. The procedure on SLUP and all other tenurial apps and permits need to be streamlined and considered to align with the EVOSS mechanism. List of requirements and procedures will be revisited.</p> <p>On the matter concerning issuance of provisional agreement under DAO 2021-27 involving SLUP and FLAg applications, NPC requests that it may also be allowed to proceed with the construction of the power plant considering the urgency of the project. Thus, said guidelines needs to be reviewed and to include policy on SAPA.</p>
4. The proof of NPC Authority to be a conditional requirement in the approval of ECC and other permits	<p>CENRO or EMB Regional Office concerned to issue Certification of Application indicating that land is public as proof of NPC's authority for SPUG plants with pending tenurial applications.</p> <p>Issuance of provisional ECC and other permits pending processing of tenurial applications to address delay in securing permits from NCIP, among others, and to fast-track project completion and commissioning.</p> <p>To furnish DENR-HO of all tenurial applications to be filed at CENROs or EMB Regional Offices as well as the list of the yet-to-be filed applications with project locations for advance evaluation.</p>
5. Emergency deployment/transfer of NPC Power Barges/ Generating Sets	Issuance of 30-days prior Notice by NPC to DENR for the deployment/transfer of NPC Power Barges/GenSets to different locations in the country to address power shortages except in emergency situations that will require less than 30-days prior Notice (e.g. calamities necessitating immediate provision of electricity).
6. Difficulty in complying with the required analysis of water effluent to BOD and Coliform, a requirement for Water Discharge Permit (WDP) due to long travel	Certain time sensitive parameters will no longer be tested due distance and travel constraints, but NPC is required to desludge/siphon wastewater (only in areas where there are DENR-

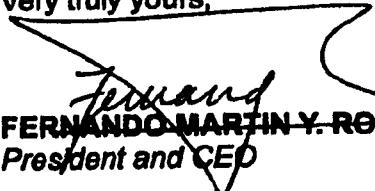
time to the nearest accredited laboratory	accredited services) and to provide water-tight septic tank in other areas.
7. Non-issuance of WDP and imposition of penalty for SPUG Plants with non-water tight septic tanks	For those with existing non-water tight septic tanks, the same should be proven sealed or build containment tanks.
8. Difficulty in complying the required septic tanks desludging, a requirement for WDP renewal for SPUG Plants located in areas without desludging services	
9. Requirement of 40-hrs Basic PCO Re-Training for Accreditation Renewal or transfer of PCO to another SPUG Plant	DENR-Head Office to issue a Memorandum to EMB to further review EMB MC 2020-28 and to standardize requirements particularly to recognize prior accreditation.
10. ECCs and WDPs were held in abeyance due to non-payment of penalties for previous non-compliances. Non-issuance of ECCs and WDPs further lead to non-issuance of Certificate of Compliance by the Energy Regulatory Commission, thus resulting to further penalties.	DENR to review the penalties and consider issuing a provisional ECC and other permits. May also need to clarify and layer the requirements or provide alternative requirements. Compliance action on the part of NPC may include, in lieu of penalties, tree-planting programs.

In addition, a Technical Working Group (TWG) and designation of focal persons from NPC and DENR per region were also agreed and thus, we respectfully submit the attached list (Annex "A") for DENR's information and designation of counterparts. Regular TWG quarterly meeting will also be scheduled and conducted.

Since the proposals could entail review of and amendments to various DENR policies, we respectfully request the Honorable Secretary's critical support in this endeavor. We hope to further strengthen our collaboration to expedite the government's objective of total electrification of SPUG areas reiterated during the President's latest SONA.

Thank you and more power!

Very truly yours,


FERNANDO MARTIN Y. ROXAS
 President and CEO

Encl.: Copy of the Presentation Material during the 28 July 2023 Meeting
 Annex A re List of NPC Focal Persons