

Republic of the Philippines  
ENERGY REGULATORY COMMISSION  
San Miguel Avenue, Pasig City

<p>IN THE MATTER OF THE APPLICATION FOR APPROVAL OF THE MAXIMUM ANNUAL REVENUE FOR THE THIRD REGULATORY PERIOD (2011 TO 2015) OF THE NATIONAL GRID CORPORATION OF THE PHILIPPINES (NGCP) DURING THE REGULATORY RESET PROCESS FOR THE THIRD REGULATORY PERIOD IN ACCORDANCE WITH THE ALTERNATIVE FORM OF RATE SETTING METHODOLOGY UNDER THE RULES IN SETTING THE TRANSMISSION WHEELING RATES (RTWR)</p>	<p>ERC CASE NO. 2009-180RC</p>
<p>NATIONAL GRID CORPORATION OF THE PHILIPPINES (NGCP),  Applicant.</p>	
<p>x-----x</p>	

## PETITION FOR INTERVENTION

COMES NOW, The National Association of Electricity Consumers for Reforms, Inc. (Nasecore), represented by its President, Pete L. Ilagan, respectfully asks this Honorable Commission to grant it leave to intervene in the instant application and respectfully states: That -

1. Movant National Association of Electricity Consumers for Reforms (NASECORE), is a non-stock/not-for-profit corporation duly organized and existing under the laws of the Republic of the Philippines, with office address at No. 10 Bayside Court Compound, 680 Quirino Avenue, Tambo, Parañaque City, represented herein by its duly authorized President, Mr. Pete L. Ilagan, and hereinafter referred to as "Nasecore";
2. Nasecore is an organization whose objective is to promote, advance, and protect the interest of ordinary consumers. It has a number of members who are customers of various distribution utilities in the country which are customers of the National Grid Corporation of the Philippines (NGCP). Any adjustment in the rates of Applicant will obviously affect the monthly electric bills of the consumers.

3. Thus, it has a legal and substantial interest in the instant *Application* and are so situated as to be adversely affected by the *Application for Approval of the Maximum Annual Revenue for the Third Regulatory Period (2011-2015) of the National Grid Corporation of the Philippines (NGCP) during the Regulatory Reset Process for the Third Regulatory Period in Accordance with the Alternative Form of Rate Setting Methodology under the Rules in Setting the Transmission Wheeling Rates (RTWR)* . It is therefore necessary to evaluate, examine and validate the costs that NGCP wants to seeks approval under the instant *Application*.
  
4. If this Honorable Commission will see fit to grant this *Petition for Intervention*, the same will not unduly delay the resolution of the instant *Application*.
  
5. It is requested that this Honorable Commission direct applicant to immediately furnish Movant copies of its **Application with the complete annexes/attachments as soon as possible** in order for Movant to come up with an intelligent study and evaluation to the instant case.

**WHEREFORE**, for the above reasons, it is respectfully prayed of this Honorable Commission to grant leave to intervene to Movant and to direct Applicant to furnish copies of the abovementioned documents.

Paranaque City for Pasig City, 22 December 2009.

**PETE L. ILAGAN**

*Movant*

**EXPLANATION:** A copy of this *Petition for Intervention* was served upon applicants counsel by personal service.

**PETE L. ILAGAN**

*Movant*

Copy furnished:

**National Grid Corporation of the Philippines**

Quezon Avenue corner BIR Road  
Diliman, Quezon City

**National Transmission Corporation**  
Quezon Avenue corner BIR Road  
Diliman, Quezon City

### VERIFICATION & CERTIFICATION

**PETE L. ILAGAN**, of legal age, Filipino, married, with office and postal address at No. 10 Bayside Court Compound, 680 Quirino Avenue, Tambo, Parañaque City, after being sworn, deposes and states: THAT

1. He is the President of the National Association of Electricity Consumers for Reforms, Inc., who had caused the preparation of the foregoing *Petition for Intervention* a copy of Secretary's Certificate authorizing Mr. Pete L. Ilagan to file this *Petition for Intervention* is attached as Annex "A"
2. He read and fully understood the allegations contained in said *Petition for Intervention* and that all the facts therein contained are true and correct based on his personal knowledge and authentic records.
3. He hereby certify that he have not commenced nor caused the commencement of any other action or proceeding involving the issues raised herein before the Regional Trial Court, the Supreme Court, the Court of Appeals or different Divisions thereof, or any other tribunal or agency, and that to the best of his knowledge, no such action or proceedings is pending before the Regional Trial Court, the Supreme Court, the Court of Appeals or different Divisions thereof, or any other tribunal or agency; and that if he should learn that a similar action or proceeding has been filed or pending before the Supreme Court, the Court of Appeals or different Divisions thereof, or any other tribunals or agency, he shall notify this Honorable Commission within five (5) days from such notice.

IN WITNESS WHEREOF, he has hereunto affixed his signature this 22nd day of December 2009 at Parañaque City.

**ILAGAN**

**PETE L.**

*Affiant*

**SUBSCRIBED AND SWORN** to before me this 22nd day of December 2009, by affiant who showed me his Drivers License N10-74-012320 issued by LTO - East Avenue.

Doc. No. \_\_\_\_\_;  
Page No. \_\_\_\_\_;  
Book No. \_\_\_\_\_;

Series of 2009