

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2024/D4**

Market Surveillance and Compliance Panel

Professor Walter Woon, Chairman
Professor Euston Quah
Mr. Philip Chua
Mr. Yeo Yek Seng

Date of Determination

10 September 2024

Party

Senoko Energy Pte. Ltd.

Subject

Failure to comply with gate closure rules on 6 May 2024

FACTS AND CIRCUMSTANCES

1. Senoko Energy Pte. Ltd. (“Senoko Energy”) submitted a self-report regarding its offer variation after gate closure for SNKCCP5 for period 26 on 6 May 2024.
2. On 6 May 2024, SNKCCP5’s alarm was triggered at 11:35 hrs (P24) due to a malfunction of the high-pressure steam water injection temperature control valve. As a result, SNKCCP5 was required to maintain its loading level at a specified level, failing which an under-generation without the activation of the spray valve would have raised the temperature and tripped the plant.
3. Accordingly, Senoko Energy submitted an offer variation after gate closure to reflect SNKCCP5’s required loading in period 26. The offer variation after gate closure included indirect changes in the price, which is not allowed under the Singapore Electricity Market Rules (“Market Rules”).
4. On 5 August 2024, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform Senoko Energy that it considered them to be in *prima facie* breach of section 10.4.1 of Chapter 6 of the Market Rules for SNKCCP5 for period 26 and invited Senoko Energy to submit written representations by 19 August 2024.
5. On 20 August 2024, Senoko Energy submitted written representations to the MSCP. In its written representations, Senoko Energy acknowledged the technical breach of the Market Rules and presented the mitigating factors for the MSCP’s consideration. Senoko Energy also reiterated that the sole intention of the offer variation was to reflect the actual generation status for the plant and to avoid a forced outage of the facility.
6. Senoko Energy did not require a hearing.

APPLICABLE MARKET RULES

7. Section 10.4.1 of Chapter 6 provides that

10.4.1 Notwithstanding sections 5.1.5, 5.1.6 and 5.1.7, no *offer variation* or revised *standing offer* shall be submitted by or for a *market participant* within 65 minutes immediately prior to the *dispatch period* to which the *offer variation* or revised *standing offer* applies, except:

10.4.1.1 where it is intended:

- a. for a *generation registered facility*, to reflect its expected ramp-up and ramp-down profiles during periods following *synchronisation* or preceding *desynchronisation*; or
- b. for a *generation registered facility*, to reflect its revised capability for the three consecutive dispatch periods immediately following a *forced outage* or its failure to *synchronise*; or
- c. for an *import registered facility*, to reflect its revised capacity for the three consecutive *dispatch periods* immediately following a *forced outage* of the *interties* connecting the *import registered facility* to the *transmission system*; or
- d. to contribute positively to the resolution of an *energy* surplus situation pertaining to which the *EMC* has issued an *advisory notice* under section 9.3.1, by allowing for decreased supply of *energy*; or
- e. to contribute positively to the resolution of *energy*, *reserve* or *regulation* shortfall situations pertaining to which the *EMC* has issued *advisory notices* under section 9.3.1, by allowing for increased supply of *energy*, *reserve* or *regulation*; or
- f. to contribute positively to the resolution of *energy*, *reserve* or *regulation* shortfall situations in that *dispatch period*, where:
 - i. the shortfall situations were indicated in a system status *advisory notice* issued by the *EMC* in respect of a *high-risk operating state* or *emergency operating state* declared by the *PSO*; and
 - ii. at the time of submission of such *offer variation* or revised *standing offer*, the *EMC* has not yet withdrawn, in respect of that *dispatch period*, such system status *advisory notice*, by allowing for increased supply of *energy*, *reserve* or *regulation*,

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and
- g. for a load registered facility, to reflect its revised capability during a forced outage or following a decrease in energy withdrawal under sections 9.3.3 and/or 9.3.4 of Chapter 5; and

10.4.1.2 where the price so *offered*, other than for additional quantities of *energy*, *reserve* or *regulation*, is the same as that previously *offered* for that *dispatch period*.

ENFORCEMENT

8. Based on the facts referred to above, the MSCP determined that Senoko Energy had breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variation submitted after gate closure for SNKCCP5 for period 26 on 6 May 2024.
9. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore. Also, the price changes were related to a reduction in price at its lowest priced offer tranche.
10. The MSCP hereby issues a letter of non-compliance and directs Senoko Energy to pay costs fixed at \$2,200.

A handwritten signature in blue ink, appearing to read 'Walter Woon', with a long, sweeping underline.

Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel