

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL  
MSCP/2024/D5**

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**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**

YTL PowerSeraya Pte. Limited

**Subject**

Failure to comply with gate closure rules on 22 May 2024

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**FACTS AND CIRCUMSTANCES**

1. YTL PowerSeraya Pte. Limited (“YTLPS”) submitted a self-report regarding its offer variations after gate closure for SERCCP3 for periods 11 and 12 on 22 May 2024.
2. On 22 May 2024 at 03:50 hrs (P8), the high pressure (“HP”) control valve suddenly closed and caused an immediate reduction in the HP main steam flow through the HP turbine. This triggered the HP pressure ratio protection trip signal at 03:53 hrs (P8) which tripped the steam turbine (“ST”). Following the ST trip, the unit load continued operating on the gas turbine (“GT”) open cycle.
3. The duty assistant shift charge engineer (“ASCE”) and the Operations team immediately began to investigate the incident and stabilise the operation of the unit as a whole. Due to the complexity in restarting the ST following a trip, the duty ASCE needed a longer time to attempt to bring the ST back online. At 04:20 hrs (P9), the ASCE notified the duty trader of the ST trip and the duty trader submitted offer variations for the upcoming periods to reflect SERCCP3’s actual capability.
4. At around 04:30 hrs, the ASCE contacted the duty trader with the technical decision that the ST was unable to couple back to the GT. Therefore, the duty trader submitted offer variations after gate closure for periods 11 and 12.
5. The offer variations after gate closure submitted for contingency reserve and regulation for period 12 fell outside of the allowable three periods window and are not allowed under the Singapore Electricity Market Rules (“Market Rules”).
6. On 5 August 2024, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform YTLPS that it considered them to be in *prima facie* breach of section 10.4.1 of Chapter 6 of the Market Rules for SERCCP3 for period 12 on 22 May 2024 and invited YTLPS to submit written representations by 19 August 2024.

7. On 19 August 2024, YTLPS submitted written representations to the MSCP. In its written representations, YTLPS reiterated the sequence of events surrounding the plant's technical issues and the duty trader's activities in the submission of the offer variations that day after the ST trip. YTLPS has also undertaken remedial actions following the incident, including reinforcing YTLPS's internal protocols to ensure a uniform response in the event of tripping of the ST going forward.
8. YTLPS did not require a hearing.

## APPLICABLE MARKET RULES

9. 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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- 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

10. Based on the facts referred to above, the MSCP determined that YTLPS had breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variations submitted after gate closure for SERCCP3 for period 12 on 22 May 2024.
11. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore.
12. The MSCP hereby issues a letter of non-compliance and directs YTLPS to pay costs fixed at \$2,200.



Professor Walter Woon  
Chairman, Market Surveillance and Compliance Panel