DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2026/D6

Market Surveillance and Compliance Panel
Professor Walter Woon, Chairman
Professor Euston Quah
Dr. Stanley Lai
Mr. Philip Chua
Mr. Yeo Yek Seng

Date of Determination
8 September 2026

Party
Tuas Power Generation Pte. Ltd.

Subject
Failure to comply with gate closure rules on 19 May 2026

FACTS AND CIRCUMSTANCES

1. On 22 May 2026, Tuas Power Generation Pte. Ltd. ("TPG") submitted its self-report regarding the offer variation after gate closure for TUASCCP2 for period 35 on 19 May 2026.

2. TUASCCP2 was expected to load at period 35 in accordance with its load startup profile. However, the TPG trader mistakenly selected the wrong offer draft file from his laptop, resulting in an erroneous submission made for period 35 onwards that day.

3. The trader discovered the error upon checking the forecast market clearing results in the Short Term Schedule ("STS") at period 33. Subsequently, the trader submitted offer variations to reflect the correct generating capability of the plant, including an offer variation after gate closure for period 35.

4. The reason for the offer variation after gate closure for period 35 was due to human error. This incident does not fall under any of the exemptions in section 10.4.1.1 of Chapter 6 of the Singapore Electricity Market Rules ("Market Rules"). Additionally, the offer variation after gate closure included an increase in offer quantity, which is not allowed under the Market Rules.

5. On 30 July 2026, the MSCP wrote to inform TPG that it considered TPG to be *prima facie* in breach of section 10.4.1 of Chapter 6 of the Market Rules for TUASCCP2 for period 35 on 19 May 2026.

6. On 14 August 2026, TPG submitted its written representations to the MSCP, stating the remedial actions it had taken towards the trader responsible for the breach. TPG 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*, including (i) a *forced outage* of the *interties* connecting the *import registered facility* to the *transmission system*, (ii) a *forced outage* or failure to *synchronise* of any constituent *generating units* in the *interconnected system* that form part of the *import registered facility*, or (iii) a *transmission* constraint within the *interconnected 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*; 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 above, the MSCP has determined that TPG breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variation after gate closure for period 35 on 19 May 2026.

9. The incident was self-reported. The breach did not have a significant impact on the National Electricity Market of Singapore. Nonetheless, the incident was due to a human error by the TPG trader. Any action by TPG against the trader responsible does not absolve TPG of culpability for the breach, nor are such actions mitigatory.

10. A financial penalty of $15,000 is imposed in respect of the breach. TPG is to pay costs fixed at $2,500.

11. TPG has been in repeated breach of the same section of the Market Rules, with this incident being the sixth breach of gate closure rules since June 2024. Strict compliance with the rules is imperative to ensure a proper functioning of the electricity market. This is a matter of crucial national interest. TPG is sternly reminded of its obligation to adhere to the Market Rules at all times. This obligation is not to be taken lightly. Further breaches will result in more serious sanctions.

Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel