

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2026/D7**

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

13 October 2026

Party

Senoko Energy Pte. Ltd.

Subject

Failure to comply with gate closure rules on 6 June 2026

FACTS AND CIRCUMSTANCES

1. On 30 June 2026, Senoko Energy Pte. Ltd. ("Senoko Energy") submitted a self-report regarding its offer variations after gate closure for SNKCCP7 for periods 36 and 37 on 6 June 2026.
2. On 6 June 2026 at 16:21 hrs (P33), a high steam turbine excitation transformer winding temperature alarm was triggered. Senoko Energy conducted an on-site verification which confirmed the high temperature reading at 16:32 hrs (P34). Subsequent attempts by Senoko Energy to lower the winding temperature were unsuccessful.
3. The shift manager assessed that the high temperature reading was attributed to high loading, elevated ambient temperature, and impaired cooling effectiveness, which would likely trip the unit if unmitigated. At 16:58 hrs (P34), the shift manager informed the duty trader that it was critical to reduce the unit load. As the dispatch run schedule for period 35 had been published, the duty trader submitted offer variations after gate closure at 17:24 hrs (P35) to reflect the unit's revised physical capability for periods 36 and 37.
4. The high temperature alarm remained continuously active till 18:45 hrs (P38), by which time the reduction in unit load, improved ventilation, and lower ambient temperature as nightfall approached, contributed to the end of the alarm trigger.
5. Given that the alarm was initiated at 16:21 hrs (P33), the offer variation after gate closure for period 36 falls within the exempted three periods window and thus has been assessed to be not a breach of the Singapore Electricity Market Rules ("Market Rules"). However, the offer variation after gate closure for period 37 falls outside of the exempted three periods window and therefore, is not allowed under the Market Rules.
6. On 1 September 2026, the MSCP wrote to inform Senoko Energy that it considered Senoko Energy to be *prima facie* in breach of section 10.4.1 of Chapter 6 of the Market Rules for

SNKCCP7 for period 37 on 6 June 2026.

7. On 14 September 2026, Senoko Energy submitted its written representations, acknowledging the technical breach. Senoko Energy also submitted mitigating circumstances for the MSCP's consideration, including identifying the measures it had taken to strengthen its controls for offer variations after gate closure. Senoko Energy did not require a hearing.

APPLICABLE MARKET RULES

8. 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

- 9. Based on the facts above, the MSCP has determined that Senoko Energy breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variation after gate closure for period 37 on 6 June 2026.
- 10. Although the incident could have been avoided if the time sensitivity required under the Market Rules was adequately considered by Senoko Energy when deciding on its actions upon detecting the technical issue, the offer variation after gate closure was made to reflect the revised capability of SNKCCP7.
- 11. Furthermore, the incident was self-reported, did not have a significant impact on the market, and the last breach by Senoko Energy occurred more than two years ago. Senoko Energy's measures to avoid further such situations are also noted.
- 12. A letter of non-compliance is issued in respect of the breach. Senoko Energy is to pay costs fixed at \$2,500.



Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel