

RESPONSE TO COMMENTS ON RC375

Submitted by	Reference	Comments	Response
SP Services	Annex 1 – Proposed Modifications to the Market Rules Chapter 2, Section 5: Facilities Registration	We understand that for an import registered facility, its injection energy quantities (“IEQ”) shall be determined by the EMC from its energy schedules instead of the energy quantities provided by the market support services licensee. As there is no IEQ data required for import MNN in the settlement file, we understand that there is no interfacing requirement between MP/EMC and SPS for registration of the import registered facility.	The IEQ for Import Registered Facility are determined by EMC based on its energy schedule. Therefore, there is no IEQ data required for import registered facility in the settlement file provided by SP Services.
SP Services	N.A.	We understand that there is no change to the net imported intertie quantity (“IIQ”) meter data transfer to EMC. Hence, this data will be read and sent to EMC as per the current process.	The IIQ should continue to reflect the net import quantity and no change is required to the current process.
Keppel	Market Rules, chapter 6, section 10.4.1	Keppel proposes for import registered facilities to be allowed to breach gate closure for a minimum of three consecutive dispatch periods immediately following notification from the intertie owner to the import registered facility of a forced outage of the intertie(s) connecting the import registered facility to the transmission system, instead of immediately following the forced outage. As the interties are not within the import registered facility’s control, a longer lead time is required for the import registered facility to receive such information and correspondingly update its revised capability in the NEMS.	MPs will be notified of the intertie outages via advisory notice in accordance with the Market Rules when there is a forced outage. We are of the view that there is sufficient time for importers to revise offers if they have put in place proper procedures.
Keppel	Market Operation Market Manual (Settlement) 4A.2	Given that the interconnector is shared by multiple import registered facility and if it becomes constrained such that the full amount of imports cannot be scheduled, how will the maximum available energy schedule be allocated between the import registered facilities? In particular, what will the settlement be for the importers of the LTMS-PIP and	The settlement of import registered facility is based on Pay-As-Scheduled. There are two scenarios where the interties connection status would affect the schedule: <ul style="list-style-type: none"> a) When both intertie lines are on outage, market clearing engine will be able to identify that Singapore system

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		<p>the Malaysian Import trial under the following scenarios:</p> <p>i) If both parties has been scheduled 100MW and either of their facilities or interties experience force outage or system constraints and is not in time to amend its offers before firm gate closure.</p> <p>ii) If both parties has been scheduled 100MW and either party experiences a forced outage in the same period as when the interconnector is operating in isolated mode.</p> <p>Keppel would also like EMC to clarify if there will be any ex-post settlement to account for the actual availabilities of the import facilities to take into consideration the actual duration of any forced and/or unplanned outages within each period.</p>	<p>is disconnected from Malaysia (“isolated mode”) and no import will be scheduled from any import registered facility for subsequent periods until the intertie is back to service. Settlement will be pro-rated accordingly.</p> <p>b) When only one of the intertie lines is on outage, a security constraint may be imposed on the interconnector to safeguard the Power System. The import quantity will be allocated to the two import registered facilities based on their offers.</p> <p>Subject to a) and b) above, if any importer’s facility experiences forced outage but unable to revise offer in time, the schedule (and consequently the settlement) will still reflect its offered capacity. There is no ex-post settlement.</p>