

RESPONSE TO COMMENTS ON RC379

Submitted By	Reference	Comments	Response
PacificLight Power	General Comments	We understand that the proposal will allow importers to immediately revise an offer should a forced outage of an import registered facility occur. Can the EMA provide us its indicative plans on how it intends to validate the occurrence of a forced outage or synchronization failure of a constituent generating unit in the interconnected system forming part of the import registered facility.	<p>Forced outage events can be verified with the following types of information</p> <ol style="list-style-type: none"> (1) Notification/self-reporting by the Market Participant, including proof of such outages (e.g. emails from upstream parties, upstream plant meter); (2) Metered Data from SP on the power flow across Malaysia-Singapore interconnector. (3) Established SOP among Importers, PSO, Transmission Licensees to communicate any outages to the PSO.
PacificLight Power	General Comments	We would request that the EMA conduct a holistic review of the gate closure time given that in future we expect an increasing amount of capacity to come from renewable sources, which are more intermittent in nature. We would therefore advocate a shorter gate closure time, as practised in other jurisdictions such as Western Australia, which will cater to outages as envisaged by the EMA but also meet the changing characteristics of new technology. A shorter closure time will enhance system security as it will enable a more accurate estimation of generation in the next period which will also obviate any need for gate crashing.	<p>This rule change is to allow importers to timely revise its offer after outage to correctly reflect its physical capability. This is in line with current gate closure exemption for generation registered facilities.</p> <p>We note the request for EMA to carry out a holistic review of the gate closure period including shortening of gate closure period with more renewable sources in the power system.</p>
EMC	Market Rules, Section 10.4.1.1c, Chapter 6	EMC would like to have more clarity on how the evidence/information related to upstream outages is to be provided to MAU to facilitate the monitoring/enforcement of rules.	The MP will need to provide necessary evidence to prove the outage event (e.g., emails from upstream parties, upstream plant meter). MAU can also make use of other available information to be provided by the PSO such as the advisory notices, annual generator/equipment outage plans and import facility outage forms, as well as interconnector metered data

			to be provided from SP to monitor importer's compliance and enforce the rules. In addition, EMA also requires PSO to develop a SOP among Importers, PSO, Transmission Licensees to communicate any outages to the PSO.
EMC	Others	<p>EMC understands that during certain situations (for example, when an IRF experiences an upstream outage or during market suspension), PSO may issue overriding dispatch instruction to IRFs to deviate from its schedule and/or operate at specific levels in order to maintain system security.</p> <p>EMC would like to clarify that in order for EMC to settle IRFs based on the directed quantity instead of the schedule, such info needs to be received by EMC by T+2BD. This timeline should also be included in the market manual.</p>	When PSO issues overriding dispatch instruction to generation registered facilities and import registered facilities, EMC will be notified of such instructions. PSO noted the need for such instruction to be provided to EMC by T+2BD. The settlement market manual has been updated to include such timeline. Please refer to Annex 2 of the rule modification.