

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2024/D3**

Market Surveillance and Compliance Panel

Professor Walter Woon, Chairman

Mr. Philip Chua

Professor Euston Quah

Mr. Yeo Yek Seng

Date of Determination

10 September 2024

Party

YTL PowerSeraya Pte. Limited

Subject

Failure to comply with gate closure rules on 10 April 2024

FACTS AND CIRCUMSTANCES

1. YTL PowerSeraya Pte. Limited ("YTLPS") submitted a self-report regarding its offer variations submitted after gate closure for SERCCP3 for periods 31 and 32 on 10 April 2024.
2. At 13:32 hrs (P28), SERCCP3 was on load as per the loading schedule for the Low-Pressure Heat Recovery Steam Generator Safety Valve live floating test.
3. While loading up the facility at 14:32 hrs (P30), the Gas Turbine ("GT") was unable to increase its loading. The duty Assistant Shift Charge Engineer ("ASCE") and the operator immediately carried out troubleshooting to find the root cause. Consequently, the duty ASCE informed the duty trader to submit offer variations after gate closure for periods 31 and 32 to accurately reflect the status of the facility and allow more time for troubleshooting.
4. During the troubleshooting, the ASCE discovered that the restriction in the unit's loading was due to the "Unit Set-point to GT" control in 'ON' mode. Therefore, the ASCE turned the "Unit Set-point to GT" control to 'OFF' mode and the facility was able to load up as scheduled in period 33.
5. The "Unit Set-point to GT" will automatically turn to the 'ON' mode when the Subgroup Control ("SGC") Unit Coordination is being initiated during a normal start-up of the facility. However, when the GT is loading above a certain level on the GT Open Cycle, the SGC must be turned to the 'OFF' mode and all GT loading is via the "GT Load Set-point" SGC.
6. The operator on duty at the SERCCP3 panel is responsible for the operations at the panel in the Central Control Room, including the checking of the "Unit Set-point to GT" during the GT open cycle load increment. In this instance, the operator and his panel assistant were managing multiple tasks simultaneously (i.e. monitoring unit parameters and processes as the unit was being run up, synchronised, and loaded up), which resulted in the oversight

during the checking. The operator was also coordinating the safety valve live floating test preparations with the maintenance and operations personnel on site. These tasks needed to be carried out to maintain overall unit stability and ensuring operational and operator safety.

7. On 11 July 2024, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform YTLPS that it considered YTLPS to be in *prima facie* breach of section 10.4.1 of Chapter 6 of the Market Rules for its offer variations submitted after gate closure for SERCCP3 for periods 31 and 32 on 10 April 2024 and invited YTLPS to submit written representations by 25 July 2024.
8. On 25 July 2024, YTLPS submitted written representations to the MSCP, reiterating the events that day and highlighting the mitigating factors. YTLPS promptly took remedial actions following the incident to prevent future reoccurrences, which included debriefing and counselling both the ASCE and the panel operator, as well as incorporating an additional step within the safety valve live floating test procedure.
9. YTLPS indicated that it did not require a hearing.

APPLICABLE MARKET RULES

10. Section 10.4.1 of Chapter 6 provides that

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 capability 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*; 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

- 11. 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 SERCCP3 for periods 31 and 32 on 10 April 2024.
- 12. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore. However, this breach was due to a human error which could have been avoided if due diligence was exercised.
- 13. The MSCP hereby imposes a financial penalty of \$7,000 and directs YTLPS to pay costs fixed at \$2,200.



Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel