

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL  
MSCP/2024/D6**

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**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**

22 October 2024

**Party**

Tuas Power Generation Pte. Ltd.

**Subject**

Failure to comply with gate closure rules on 3 June 2024

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**FACTS AND CIRCUMSTANCES**

1. Tuas Power Generation Pte. Ltd. (“TPG”) submitted a self-report regarding its offer variations after gate closure for TUASCCP5 for periods 13, 24 and 25 on 3 June 2024.
2. TUASCCP5 was under planned maintenance approved by the Power System Operator (“PSO”) from 18 May to 6 June 2024 and underwent re-commissioning activities with General Electric’s Technical Advisor (“GETA”) from 3 to 6 June 2024.
3. Following TUASCCP5’s recent overhaul, GETA conducted gas combustor tuning, gas mapping, and temperature after high-pressure turbine verification for the facility. The data collected from these activities would help to re-establish the facility’s safe operating parameters and limits, as operation at higher loading levels without these data can result in the facility’s forced outage.
4. At 04:48 hrs (P10), the station staff informed the duty trader that TUASCCP5’s loading had to be maintained as GETA required more time to monitor the combustor situation at the said level. Accordingly, the duty trader submitted an offer variation after gate closure for period 13.
5. Subsequently at 10:28 hrs (P21), TUASCCP5 was unable to reach the required scheduled loading, so the station staff advised the duty trader to revise the facility loading while they proceeded to troubleshoot the issue. An offer variation after gate closure was accordingly submitted for period 24.

6. At 11:00 hrs (P23), it was determined that the root cause of the issue was due to inlet guide vane (“IGV”) settings. After adjusting the IGV, GETA requested the duty trader to further amend TUASCCP5’s loading level for data collection and gas mapping purposes to ensure that all settings were in order. Consequently, offer variations after gate closure were submitted for periods 24 and 25 to reflect the request from GETA.
7. The offer variations after gate closure for periods 13, 24 and 25 were not due to a restriction of use or reduction in performance of equipment, and consequently are not exempted under the Market Rules.
8. On 4 September 2024, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform TPG that it considered TPG 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 TUASCCP5 for periods 13, 24 and 25 on 3 June 2024 and invited TPG to submit written representations by 16 September 2024.
9. On 16 September 2024, TPG submitted written representations to the MSCP and indicated that it did not require a hearing. The written representations by TPG included a reiteration of its view on why the offer variations after gate closure had to be submitted. TPG also sought clarity from the MSCP on the actions required from TPG in such circumstances.

## 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 TPG had breached section 10.4.1 of Chapter 6 of the Market Rules for TUASCCP5 for periods 13, 24 and 25 on 3 June 2024.
- 12. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore.
- 13. The MSCP hereby issues a non-compliance letter to TPG and directs TPG to pay costs fixed at \$2,200. The MSCP reminds TPG that it remains its responsibility to meet its obligations under the Market Rules, and to adequately plan for re-commissioning activities to avoid similar occurrences in future.



Professor Walter Woon  
Chairman, Market Surveillance and Compliance Panel