

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

22 October 2024

Party

Tuas Power Generation Pte. Ltd.

Subject

Failure to comply with gate closure rules on 6 June 2024

FACTS AND CIRCUMSTANCES

1. Tuas Power Generation Pte. Ltd. (“TPG”) submitted a self-report regarding its offer variations after gate closure for TUASCCP5 for period 47 on 6 June 2024.
2. TUASCCP5 was under planned maintenance approved by the Power System Operator (“PSO”) from 18 May 2024 to 6 June 2024. During this period, the unit was undergoing re-commissioning activities beginning from 3 June 2024 at 03:01 hrs (P7). The unit re-commissioning activities were notified to the PSO prior to commencement, and were planned to be completed on 6 June 2024 22:30 hrs (P46). The unit’s tuning activities were undertaken by an outsourced re-commissioning team belonging to General Electric (“GE”).
3. On 6 June 2024 at 21:31 hrs (P44), issues with the condenser vacuum were raised by GE Technical Advisor (“GETA”) during the start-up auto-run-up of the unit. The normal ejector malfunctioned and was unable to remove the air from the condenser, thereby requiring the start-up ejector to start up the unit. This led to a delay in loading up the unit and in the subsequent tuning activities. The delay in the unit’s loading up also affected the subsequent fuel change-over tests as the unit loading was required to be maintained for the duration of tuning and fuel change-over tests.
4. While the tuning activities were in progress, at 22:05 hrs (P45), the station staff informed the duty trader that more time was required for further tuning and completing the fuel change-over tests, and that the tests would continue into period 47. The duty trader submitted an offer variation after gate closure at 22:09 hrs (P45) for period 47 to reflect the actual unit loading for that period.
5. The offer variation after gate closure involving an increase in offer quantity does not fall within the permissible grounds specified in section 10.4.1 of Chapter 6 of the Singapore Electricity Market Rules (“Market Rules”) and is therefore not allowed.

6. On 4 September 2024, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform TPG that it considered them to be *prima facie* in breach of section 10.4.1 of Chapter 6 of the Market Rules for TUASCCP5 for period 47 on 6 June 2024 and invited TPG to submit written representations by 16 September 2024.
7. On 16 September 2024, TPG submitted written representations to the MSCP. In its written representations, TPG highlighted the unit’s technical issues prior to the gate closure window for period 47 on 6 June 2024 and explained the reason for which issues with the condenser vacuum were only raised by GETA at 21:31 hrs (P44).
8. TPG did not require a hearing.

APPLICABLE MARKET RULES

9. 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* 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*,

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- 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

10. 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 the offer variations submitted after gate closure for TUASCCP5 for period 47 on 6 June 2024.
11. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore.
12. The MSCP hereby issues a letter of non-compliance and directs TPG to pay costs fixed at \$2,200.



Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel