

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2025/D1**

Market Surveillance and Compliance Panel

Professor Walter Woon, Chairman
Professor Euston Quah
Mr. Philip Chua
Mr. Yeo Yek Seng

Date of Determination

7 March 2025

Party

Keppel Seghers Tuas Waste-To-Energy Plant Pte. Ltd.

Subject

Failure to comply with gate closure rules on 27 October 2024

FACTS AND CIRCUMSTANCES

1. On 6 November 2024, Keppel Seghers Tuas Waste-To-Energy Plant Pte. Ltd. (“KSTP”) submitted a self-report regarding its offer variations after gate closure for GENR (KEPPEL) on 27 October 2024.
2. On 27 October 2024, the turbo generator extraction cylinder operated control valve suddenly closed, resulting in a high extraction pressure greater than 7.2 barg. The interlock protection system initiated a tripping of the turbo generator and GENR (KEPPEL) experienced a forced outage at 15:23 hrs (P31).
3. At 16:05 hrs (P33), KSTP submitted offer variations after gate closure for GENR (KEPPEL) for periods 34 and 35. There was a delay in the offer submissions because the team was concentrating on stabilising the plant process system when the turbo generator tripped. If KSTP did not stabilise the plant process system, the boilers may trip due to the high boiler drum level.
4. The Singapore Electricity Market Rules (“Market Rules”) allow offer variations after gate closure to be submitted only for the three consecutive dispatch periods immediately following a facility’s forced outage or failure to synchronise. Given that GENR (KEPPEL) experienced the forced outage at 15:23 hrs (P31), the offer variation submitted after gate closure for period 35 was not in compliance with the Market Rules.
5. On 3 February 2025, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform KSTP that it considered them to be *prima facie* in breach of section 10.4.1 of Chapter 6 of the Market Rules for GENR (KEPPEL) for period 35 on 27 October 2024 and invited KSTP to submit written representations.
6. On 20 February 2025, KSTP replied that it would not be submitting written representations to the MSCP. KSTP did not require a hearing.

APPLICABLE MARKET RULES

7. 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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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

8. Based on the facts above, the MSCP determined that KSTP had breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variation submitted after gate closure for GENR (KEPPEL) for period 35 on 27 October 2024.
9. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore.
10. The MSCP therefore issues a letter of non-compliance and directs KSTP to pay costs fixed at \$2,200.

A handwritten signature in blue ink, appearing to read 'Walter Woon', with a long, sweeping underline.

Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel