

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2025/D2**

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

16 April 2025

Party

ExxonMobil Asia Pacific Pte. Ltd.

Subject

Failure to comply with gate closure rules on 13 December 2024

FACTS AND CIRCUMSTANCES

1. On 15 January 2025, ExxonMobil Asia Pacific Pte. Ltd. ("ExxonMobil") submitted a self-report regarding its offer variations after gate closure for EXON G4 for periods 32 and 33 on 13 December 2024.
2. As part of the maintenance activity conducted (which involved the online replacement of the power supply for the Process Control and Safety Systems for the gas turbine), a step in the procedure was to manually turn off the auto trip in EXON G4. This step was to prevent unintended trips during the replacement of the power supply.
3. In the programmable logic controller, selecting the "False" logic, followed by the "Send & Close" button to register the instruction, manually turns off the auto trip function.
4. Due to the proximity of the "Send & Close" button with another button called "Toggle Value", the "Toggle Value" button was accidentally selected instead of the "Send & Close" button. This changed the "False" logic to "True" and automatically bypassed the need to select the "Send & Close" button. As a result, there was an emergency stop and forced outage of EXON G4 at 14:26 hrs (P29).
5. EXON G4 serves as a steam generator in addition to the power it generates. ExxonMobil explained that after the tripping of EXON G4, ExxonMobil had to divert its resources to try and stabilise the overall steam pressure at the site given a contemporaneous outage of another steam generator, and thus the offer variations for EXON G4 for periods 32 and 33 were submitted after gate closure.
6. To prevent recurrence, an independent verification step is now required to be done where an experienced personnel will check and verify that the selection made on the screen is correct and that the cursor is hovering over the correct button before giving the go-ahead to proceed.

7. 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 EXON G4 experienced the forced outage at 14:26 hrs (P29), the offer variation submitted after gate closure for period 33 was not in compliance with the Market Rules.
8. On 5 March 2025, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform ExxonMobil that it considered them to be *prima facie* in breach of section 10.4.1 of Chapter 6 of the Market Rules for EXON G4 for periods 32 and 33 on 13 December 2024 and invited ExxonMobil to submit written representations.
9. On 19 March 2025, ExxonMobil submitted its written representations to the MSCP where it elaborated on the incident and reiterated the sequence of events that day. In this incident, an unanticipated and unintentional change in the trip logic for the maintenance work caused EXON G4 to trip and destabilised the steam pressure at the site. ExxonMobil sought the MSCP’s consideration given the circumstances behind this trip, and ExxonMobil’s efforts to most accurately offer what EXON G4 could produce.
10. ExxonMobil did not require a hearing.

APPLICABLE MARKET RULES

11. 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*,

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

- 12. With regard to the offer variation submitted after gate closure for EXON G4 for period 32 on 13 December 2024, the MSCP has decided to take no further action on the matter.
- 13. Based on the facts above, the MSCP determined that ExxonMobil had breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variation submitted after gate closure for EXON G4 for period 33 on 13 December 2024.
- 14. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore. The MSCP has considered the mitigating factors submitted by ExxonMobil in its written representations. However, this breach could have been avoided had ExxonMobil considered the time-sensitivity under the Market Rules. Furthermore, the root cause of the incident was an egregious human error, which resulted in the forced outage of EXON G4 and necessitated the need for the submission of the offer variation for period 33.
- 15. The MSCP therefore imposes a financial penalty of \$5,000 and directs ExxonMobil to pay costs fixed at \$2,200. ExxonMobil is reminded of its essential obligation to exercise more care and caution to prevent a recurrence of human errors that may potentially affect the efficient functioning of the market.



Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel