

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2025/D3**

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

11 June 2025

Party

ExxonMobil Asia Pacific Pte. Ltd.

Subject

Failure to comply with gate closure rules and submit offer variations to reflect generating capability on 27 January 2025

FACTS AND CIRCUMSTANCES

1. On 28 February 2025, ExxonMobil Asia Pacific Pte. Ltd. ("ExxonMobil") submitted a self-report regarding the offer variations after gate closure for EXON G3 for periods 33 and 34 on 27 January 2025.
2. ExxonMobil initiated the ramp-up of EXON G3 at 13:30 hrs (P28). During the ramp-up, a control valve automatically opened, feeding boiler feed water to the Heat Recovery Steam Generator ("HRSG") to generate steam. ExxonMobil did not observe any issues with the HRSG steam drum level at this point in time.
3. As EXON G3 continued ramping up, the flow of the boiler feed water transited between two control valves. At this time, a third control valve experienced a positioner relay failure. The positioner is responsible for modulating the air supply to the actuator, which controls the valve's opening and closing.
4. The faulty control valve was unable to respond to the Distributed Control System ("DCS") command in the control room, and therefore remained fully closed. This prevented boiler feed water from reaching the control valve to the HRSG. Consequently, the HRSG steam drum level dropped and reached its threshold, triggering an automatic runback of EXON G3 to prevent the facility from tripping.
5. ExxonMobil also added that the faulty control valve appeared to be fully opened on the DCS in the control room, when it was in fact fully closed at the actual plant site. The discrepancy between the DCS display and the actual valve status was due to a loss of signal arising from the positioner relay failure.

6. At 14:09 hrs (P29), offer variations were submitted for EXON G3 to reduce its offer quantity for periods 30 to 48 on 27 January 2025. However, the offer submission was invalid and rejected by the offer submission system. According to ExxonMobil, it was unaware of the rejection of the submission, and therefore assumed that the submission was accepted as valid.
7. ExxonMobil clarified that an alarm will be triggered notifying ExxonMobil of its deviation from the dispatch schedule, and the alarm typically resets after a deviation has been resolved. In this case, the first alarm was triggered when the initial deviation happened at 13:54 hrs (P28). As EXON G3 continued to deviate from the dispatch schedule, the alarm was not automatically reset by the system and therefore, there were no subsequent alarms triggered to notify the operator of the ongoing deviation.
8. At around 15:30 hrs (P32), the Power System Operator ("PSO") informed ExxonMobil that EXON G3 had not been meeting the scheduled dispatch since period 28. Following the PSO's notification, ExxonMobil submitted offer variations for EXON G3, including offer variations after gate closure for periods 33 and 34.
9. The Singapore Electricity Market Rules ("Market Rules") require offer variations to be submitted to reflect the generating capability of a registered facility. Given that the offer submissions were rejected by the offer submission system, ExxonMobil failed to comply with this obligation for periods 30 to 32. Additionally, the 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. As EXON G3 experienced the technical incident at period 28, the offer variations submitted after gate closure for periods 33 and 34 were not in compliance with the Market Rules.
10. On 28 April 2025, the Market Surveillance and Compliance Panel ("MSCP") wrote to inform ExxonMobil that it considered them to be in *prima facie* breach of section 5.1.5 of Chapter 6 of the Market Rules for periods 30 to 32 and section 10.4.1 of Chapter 6 of the Market Rules for periods 33 and 34 on 27 January 2025.
11. On 13 May 2025, ExxonMobil submitted its written representations to the MSCP where it elaborated on the incident and reiterated the sequence of events that day. ExxonMobil viewed that the unanticipated failure of the positioner relay coupled with the rigidity of the offer submission system contributed to the successful renomination only being made at period 32. ExxonMobil seeks MSCP's favourable consideration given the circumstances behind this trip and ExxonMobil's efforts to most accurately offer what EXON G3 could produce as timely as possible.
12. ExxonMobil did not require a hearing.

APPLICABLE MARKET RULES

13. Section 5.1.5 of Chapter 6 provides that
 - 10.4.1 Subject to section 10.4.1, for any *dispatch period* in the current *market outlook horizon*, if the quantity currently *offered* in a valid *offer* for a *registered facility* exceeds the relevant quantity that its *dispatch coordinator* reasonably expects to be available from the *registered facility* by more than:
 - 5.1.5.1 10 MW; or
 - 5.1.5.2 5 percent of the quantity currently *offered*,

whichever is greater, then that *dispatch coordinator* shall immediately submit an offer variation for that *registered facility* for that *dispatch period* to the EMC.

14. 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

15. Based on the facts above, the MSCP determined that ExxonMobil had breached section 5.1.5 of Chapter 6 of the Market Rules for periods 30 to 32 and section 10.4.1 of Chapter 6 of the Market Rules for the offer variations after gate closure for EXON G3 for periods 33 and 34 on 27 January 2025.
16. With regard to the failure to submit offers to reflect the facility's actual capacity for periods 30 to 32 on 27 January 2025, the MSCP issues a letter of non-compliance and highlights to ExxonMobil on its obligation to submit offer variations reflecting its generating capability under the Market Rules.
17. With regard to the offer variations after gate closure for periods 33 and 34 on 27 January 2025, the MSCP has considered the mitigating factors submitted by ExxonMobil in its written representations. Additionally, the incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore. Nonetheless, this breach could have been avoided had ExxonMobil exercised due diligence in verifying whether the offer submission was successfully accepted by the system, as a notification was displayed regarding the invalid offer.
18. The MSCP therefore imposes a financial penalty of \$9,400 and directs ExxonMobil to pay costs fixed at \$2,200. ExxonMobil is reminded to exercise greater diligence in meeting its obligations under the Market Rules given that the last breach by ExxonMobil occurred one month before the current incident on 13 December 2024, and both incidents were attributed to oversight.



Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel