

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL  
MSCP/2025/D5**

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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**

18 August 2025

**Party**

Tuas Power Generation Pte. Ltd.

**Subject**

Failure to comply with gate closure rules on 21 April 2025

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**FACTS AND CIRCUMSTANCES**

1. On 23 April 2025, Tuas Power Generation Pte. Ltd. (“TPG”) submitted a self-report regarding the offer variations after gate closure for TUASCCP4 for periods 40 to 42 on 21 April 2025.
2. During TUASCCP4’s re-commissioning, an alarm was triggered at 18:51 hrs (P38) on 21 April 2025 when the auto-load runback was activated due to the malfunction of the gas temperature valve. After the alarm was triggered, the operator started attempting to stabilise the unit at its minimum stable load to investigate the local equipment. The stand-by maintenance team was also called in to investigate and rectify the fault.
3. At 19:14 hrs (P39), it was determined that TUASCCP4 could only hold at the minimum stable load, until the fault was rectified.
4. Given that the offer variation for the next trading period (i.e. period 40) had to be submitted by 19:25 hrs (P39) in order for the offer to be used in the production of the real-time schedule for period 40, TPG’s trader prioritised the submission of the offer variations for periods 40 and 41 to reflect the actual status of the plant. This set of offer variations for periods 40 and 41 were submitted after gate closure, to reduce the offer quantity of TUASCCP4.
5. Regarding period 42, the trader had intended to submit an offer variation before gate closure, i.e. before 19:25 hrs (P39). However, the offer variation for period 42 was eventually submitted after gate closure at 19:28 hrs (P39), for the following reasons:
  - a. The trader was busy with communications with the station staff.
  - b. Although the trader’s earlier offer variation could have been made to apply for all three periods (i.e. periods 40, 41 and 42), more time would have been required to make the submission.

- c. The trader wanted to confirm the operational capability of the unit for period 42 before submitting the relevant offer variation.
6. Nonetheless, TPG recognised that the trader could have been more conservative and assumed that the facility had the same operational capability in period 42 as for periods 40 and 41. TPG also highlighted that traders have to make quick judgement calls given the time pressures involved for such situations, which, with hindsight, may not be the best.
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 the technical incident occurred when the alarm was triggered at 18:51 hrs (P38), the offer variation after gate closure for period 42 was not in compliance with the Market Rules. The offer variations after gate closure for periods 40 and 41 had been separately assessed to be no breach of the Market Rules.
8. On 1 July 2025, 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 TUASCCP4 for period 42 on 21 April 2025 and invited TPG to submit written representations by 15 July 2025.
9. On 15 July 2025, TPG submitted its written representations to the MSCP where it stated that it takes compliance with the Market Rules seriously and a refresher training has been conducted for its traders regarding the submission of offers during gate closure.
10. TPG 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. Based on the facts above, the MSCP determined that TPG had breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variation submitted after gate closure for TUASCCP4 for period 42 on 21 April 2025.
- 13. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore.
- 14. The last breach by TPG on the gate closure rules occurred eight months ago. The MSCP reminds TPG of the importance on the time sensitivity required under the Market Rules, TPG should implement effective measures to prevent a similar recurrence in future.
- 15. The MSCP hereby imposes a financial penalty of \$5,000 and directs TPG to pay costs fixed at \$2,200.



Professor Walter Woon  
Chairman, Market Surveillance and Compliance Panel