

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2025/D6**

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

8 September 2025

Party

Aster Chemicals and Energy Pte. Ltd.

Subject

Failure to comply with gate closure rules and submit offer variations to reflect generating capability on 4 May 2025

FACTS AND CIRCUMSTANCES

1. On 13 June 2025, Aster Chemicals and Energy Pte. Ltd. (“Aster Chemicals”) submitted a self-report regarding the offer variations after gate closure for SHUL G1 for periods 13 and 14 on 4 May 2025.
2. On 4 May 2025 at approximately 03:25 hrs (P7), one of the steam generators tripped due to a forced draft fan motor clutch failure. This caused a significant drop in the steam header pressure as there was also another steam generator under maintenance at the time of the trip.
3. SHUL G1 is one of the site’s largest consumers of steam that is used to generate electricity. Given the drop in the steam header pressure, SHUL G1 was shut down and experienced a forced outage at 40MW at 03:44 hrs (P8), in order to stabilise the steam network and prevent downstream process unit trips.
4. At 03:51 hrs (P8), the production team leader (“PTL”) attempted to submit an offer variation for periods 9 to 48 to reflect the forced outage of SHUL G1. However, the offer submission was invalid and rejected by the offer submission system. According to Aster Chemicals, the PTL was unaware that the offer variation was rejected and promptly focused on the steam stabilisation efforts on site.
5. At 04:29 hrs (P9), the Power System Operator (“PSO”) informed Aster Chemicals that SHUL G1 had been deviating from its dispatch schedule. When the issue persisted, the PSO contacted Aster Chemicals again at 05:07 hrs (P11). As the PTL was occupied with the site’s steam stabilisation, Aster Chemicals was unable to verify the offer submission for SHUL G1.

6. Following the PSO's notification, the PTL logged a call with the Energy Market Company Pte Ltd ("EMC") helpdesk to seek clarification on their offer submission. However, before receiving the follow-up call from an EMC representative, the PTL proceeded to submit offer variations after gate closure for SHUL G1 for periods 13 and 14 at 05:43 hrs (P12).
7. 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, Aster Chemicals failed to comply with this obligation for periods 9 to 12. 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. Given that the forced outage of SHUL G1 occurred at 03:44 hrs (P8), the offer variations after gate closure for periods 13 and 14 fall outside the exempted three periods window and, therefore, are not allowed under the Market Rules.
8. On 4 August 2025, the Market Surveillance and Compliance Panel ("MSCP") wrote to inform Aster Chemicals that it considers Aster Chemicals to be in *prima facie* breach of section 5.1.5 of Chapter 6 of the Market Rules for periods 9 to 12, and section 10.4.1 of Chapter 6 of the Market Rules for periods 13 and 14 on 4 May 2025
9. On 18 August 2025, Aster Chemicals submitted its written representations to the MSCP where it reiterated the circumstances surrounding the breach and the mitigating measures that Aster Chemicals has taken, including a refresher training on electrical bidding to the relevant staff.
10. Aster Chemicals did not require a hearing.

APPLICABLE MARKET RULES

11. Section 5.1.5 of Chapter 6 provides that

5.1.5 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*.

12. 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

13. Based on the facts above, the MSCP determined that Aster Chemicals breached section 5.1.5 of Chapter 6 of the Market Rules with regard to its failure to revise offers to reflect the facility's actual capacity for periods 9 to 12, and section 10.4.1 of Chapter 6 of the Market Rules for the offer variations after gate closure for periods 13 and 14 for SHUL G1 on 4 May 2025.
14. This is the first breach of the Market Rules by Aster Chemicals since it acquired its generation facilities from Shell Singapore Pte. Ltd. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore. Nonetheless, the breach could have been avoided had due care been exercised in verifying the status of its offer submissions. Please ensure that all personnel entrusted with submitting offers are properly trained and briefed as to their duties.
15. Under the circumstances, no action will be taken beyond the issue of a letter of non-compliance. Aster Chemicals is to pay costs fixed at \$2,200.



Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel