

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2025/D7**

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

12 November 2025

Party

PacificLight Power Pte. Ltd.

Subject

Failure to comply with gate closure rules on 31 July 2025

FACTS AND CIRCUMSTANCES

1. On 15 August 2025, PacificLight Power Pte. Ltd. (“PLP”) submitted a self-report regarding the offer variations after gate closure for PACLBLK2 for periods 42 and 43 on 31 July 2025.
2. On 31 July 2025, PACLBLK1 experienced a forced outage at 19:47 hrs (P40). The trader on duty that day was crossed trained to perform duty while managing his primary job scope in another role. Following PACLBLK1’s forced outage, the duty trader had intended to submit offer variations to remove all of PACLBLK1’s contingency reserve quantities in periods 42 and 43.
3. However, he was overwhelmed and while submitting the offer variations for PACLBLK1, he unintentionally included PACLBLK2 in its submission. This mistake resulted in a removal of all contingency reserve quantities for PACLBLK2 in periods 42 and 43.
4. The mistaken offer variations after gate closure for PACLBLK2’s contingency reserve for periods 42 and 43 were due to a human error and were not allowed under the Singapore Electricity Market Rules (“Market Rules”).
5. On 2 October 2025, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform PLP that it considered PLP to be in *prima facie* breach of section 10.4.1 of Chapter 6 of the Market Rules for periods 42 and 43 on 31 July 2025.
6. On 16 October 2025, PLP submitted its written representations to the MSCP to provide additional information on the duty trader who made the mistake in the offer submission and the circumstances surrounding the incident that day. PLP also stated that the offer submission was a genuine mistake and not an intentional act.
7. PLP did not require a hearing.

APPLICABLE MARKET RULES

8. 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*; 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

9. Based on the facts above, the MSCP determined that PLP breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variations after gate closure for periods 42 and 43 on 31 July 2025.
10. The incident was self-reported. The results of the simulation conducted also show that the incorrect removal of the contingency reserve offers for PACLCLK2 did not create a significant impact on the National Electricity Market of Singapore.
11. Under the circumstances, no action will be taken beyond the issue of a letter of non-compliance. PLP is to pay costs fixed at \$2,200.
12. This is PLP's second breach of the Market Rules arising from a human error. It is imperative that PLP should ensure that its offer submissions are correct at all times in order to ensure the proper functioning of the market.



Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel