

**DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2026/D1**

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 March 2026

Party

Senoko Waste-to-Energy Pte. Ltd.

Subject

Failure to comply with gate closure rules on 13 November 2025

FACTS AND CIRCUMSTANCES

1. On 2 December 2025, Senoko Waste-to-Energy Pte. Ltd. ("Senoko WTE") submitted its explanations regarding the offer variations after gate closure for GENR 1 for periods 7 and 8 on 13 November 2025.
2. On 13 November 2025, a fully open bypass station 'A' at GENR 1 caused insufficient steam to be channelled to the steam turbine for power generation, resulting in a drop in GENR 1's generation output from period 3 onwards.
3. The fully open bypass station 'A' was caused by a broken linear voltage differential transformer ("LVDT") rod, which happened at around 01:08 hrs (P3) when the steam flow in the bypass station 'A' spiked. Senoko WTE proceeded to carry out repair works on the LVDT rod.
4. To reflect the drop in GENR 1's power generation, Senoko WTE submitted an offer variation at 01:37 hrs (P4) to reduce the offer quantity for period 7 onwards. As Senoko WTE expected GENR 1 to normalise its power generation from period 7 onwards, Senoko WTE submitted another offer variation at 02:11 hrs (P5) to increase the offer quantity for period 7 onwards.
5. After the completion of the repair of bypass station 'A' LVDT rod at around 02:30 hrs (P6), Senoko WTE observed a difference between the actual physical opening percentage of the bypass station 'A' and its feedback to the central control room. As it is important to tally both values for an accurate control to achieve a stable operation, Senoko WTE submitted an offer variation at 02:40 hrs (P6) to reduce the offer quantity for period 7 onwards.

6. The offer variations for periods 7 and 8 were submitted after gate closure. Given that the technical incident arising from the broken LVDT rod occurred at 01:08 hrs (P3), the offer variations after gate closure for periods 7 and 8 fall outside of the exempted three periods window and, therefore, are not allowed under the Singapore Electricity Market Rules (“Market Rules”). Additionally, the offer variations after gate closure for period 7 reflected an effective increase in offer quantity, which is also not allowed under the Market Rules.
7. On 29 January 2026, the MSCP wrote to inform Senoko WTE that it considers Senoko WTE to be *prima facie* in breach of section 10.4.1 of Chapter 6 of the Market Rules for GENR 1 for periods 7 and 8 on 13 November 2025.
8. On the same day, Senoko WTE informed that it would not be submitting any written representations and did not require a hearing.

APPLICABLE MARKET RULES

9. 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*, including (i) a *forced outage* of the *interties* connecting the *import registered facility* to the *transmission system*, (ii) a *forced outage* or failure to *synchronise* of any constituent *generating units* in the *interconnected system* that form part of the *import registered facility*, or (iii) a *transmission* constraint within the *interconnected 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

- 10. Based on the facts above, the MSCP determined that Senoko WTE breached section 10.4.1 of Chapter 6 of the Market Rules for the offer variations after gate closure for periods 7 and 8 on 13 November 2025.
- 11. The incident was self-reported. The breach did not have a significant impact on the National Electricity Market of Singapore.
- 12. Under the circumstances, no action will be taken beyond the issue of a letter of non-compliance. Senoko WTE is to pay costs fixed at \$2,500.



Professor Walter Woon
Chairman, Market Surveillance and Compliance Panel