

Notice of Market Rules Modification

Paper No.: EMC/RCP/107/2019/357
Rule Reference: Chap 6 sec 10.4
Proposer: EMC, Market Admin
Date Received by EMC: 17 January 2019
Category Allocated: 2
Status: Adopted by Board
Effective Date: NA

This rule change proposal seeks to implement the following changes to the gate closure exemptions:

Proposed Change to Gate Closure Exemption	Tabled at RCP meeting	Supported by RCP
(i) Expand the gate closure exemptions to allow a load registered facility (LRF) to revise its reserve offers within gate closure to reflect its unavailability following an activation of reserve	105 th – CP74 Restoration of Load Registered Facilities Activated to Provide Reserve	By majority vote
(ii) Refine the existing gate closure exemption - for a generation registered facility (GRF) that has experienced a forced outage to reflect its revised capability after gate closure - allow the GRF to reflect its reduced capability after gate closure for only the first 3 periods following the forced outage;	106 th – CP75 Review of Gate Closure Rules	By majority vote
(iii) Expand the gate closure exemptions to include two other proposed exemptions, namely <ul style="list-style-type: none"> • To reflect a GRF's revised capability when it fails to synchronise • To increase energy, reserve or regulation supply if it improves a shortfall situation, for which a High-Risk Operating State (HOS) system status advisory notice is in effect. 		Unanimously

At the 107th RCP meeting, the RCP unanimously **support** the proposed rule modifications as set out in **Annex 1**.

Date considered by Rules Change Panel: 05 March 2019

Date considered by EMC Board: 20 March 2019

Date considered by Energy Market Authority:

Proposed rule modification:

See attached paper.

Reasons for rejection/referral back to Rules Change Panel (if applicable):

PAPER NO. : **EMC/BD/02/2019/05b**

RCP PAPER NO. : **EMC/RCP/107/2019/357**

SUBJECT : **GATE CLOSURE EXEMPTIONS**

FOR : **DECISION**

PREPARED BY : **JO ONG ZU ER
SENIOR ECONOMIST**

REVIEWED BY : **VERONICA RODRIGUEZ
SVP, MARKET ADMINISTRATION**

DATE OF MEETING : **20 MARCH 2019**

Executive Summary

This rule change proposal seeks to implement the following changes to the gate closure exemptions:

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(iii) Expand the gate closure exemptions to include two other proposed exemptions, namely <ul style="list-style-type: none"> • To reflect a GRF's revised capability when it fails to synchronise • To increase energy, reserve or regulation supply if it improves a shortfall situation, for which a High-Risk Operating State (HOS) system status advisory notice is in effect. 		Unanimously

At the 107th RCP meeting, the RCP unanimously **support** the proposed rule modifications as set out in **Annex 1**.

1. Introduction

This rule change proposal seeks to implement the proposed changes to the gate closure exemptions supported by the RCP at the 105th and 106th RCP meetings.

2. Background

These proposed changes to the gate closure exemptions arise from CP74 which studied the restoration of LRFs activated for reserve and CP75 which reviewed the gate closure rules.

2.1 Current Gate Closure Exemptions

Chapter 6 Sections 10.4.1 and 10.4.2 of the Market Rules provide for offer or bid changes to be submitted after gate closure for a period under any of the following conditions:

For offer changes,

- (a) To reflect a GRF's expected ramp profiles during periods following synchronisation or preceding de-synchronisation
- (b) To reflect a GRF's revised capability during a forced outage
- (c) To decrease energy supply in an energy surplus situation, for which a market advisory notice has been issued
- (d) To increase energy, reserve or regulation supply if it improves a shortfall situation, (i) for which a market advisory notice has been issued or (ii) for which an Emergency Operating State (EOS) system status advisory notice is in effect (i.e. has been issued and not yet withdrawn)

For bid changes,

- (e) To reflect a LRF's revised capability during a forced outage or following a decrease in energy withdrawal from reserve activation
- (f) To increase quantities in its energy bids if it improves an energy shortfall situation, for which a market advisory notice has been issued or for which an EOS system status advisory notice is in effect.

And subject to the following condition:

- (g) The price so offered or bidden, other than for additional quantities, is the same as that previously offered or bidden for that period

2.2 Rationale of Gate Closure Exemptions

The exemptions fall into two categories:

- exemptions that relates to a specific GRF or LRF better reflecting its physical capability (conditions (a), (b) and (e) in section 2.1); and
- exemptions that relates to situations whereby the overall system is under stress and all units (rather than a specific GRF or LRF) are encouraged to reduce or increase their offers or bids in a way that contributes positively to resolving the system situation (conditions (c), (d) and (f) in section 2.1).

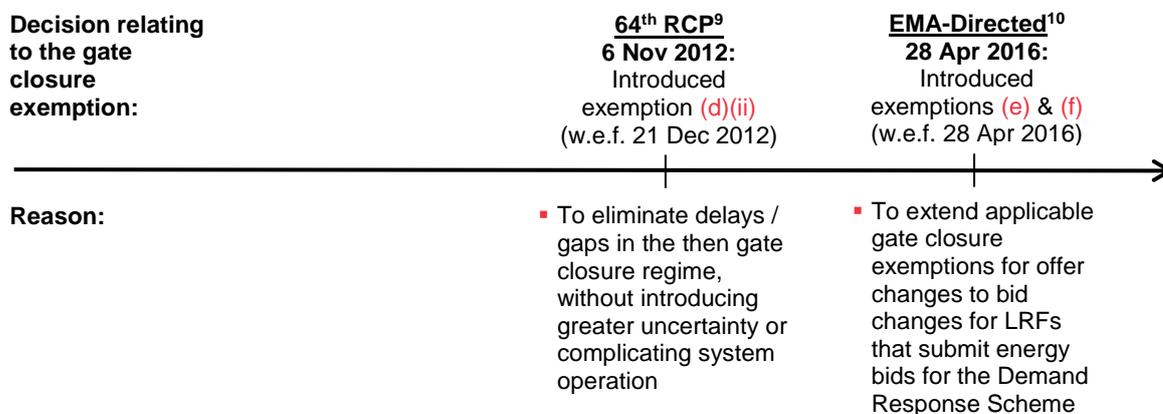
These two types of gate closure exemptions exist for the primary reason of system security. While the contribution of the second type of gate closure exemptions to system security is obvious, the contribution of the first type of gate closure exemptions to system security lies in that individual units can take immediate action to reflect unforeseen changes in their physical capability in their offers. Without doing so, such last-minute changes in their physical capability, whether due to changes in machine characteristics or forced outages, could cause the units to fall short of their

cleared offers (while insufficient generation is cleared from other physically available units), compromising system security.

Hence, in assessing the expansion of gate closure exemptions, system security considerations take priority.

The gate closure exemptions have been expanded twice since market start. Figure 1 below shows the evolution of the gate closure exemptions.

Figure 1: Timeline of Evolution of Gate Closure Exemptions



3. Proposals

This rule change proposal seeks to implement the following changes to the gate closure exemptions:

- (i) Expand the gate closure exemptions to allow an LRF to revise its reserve offers within gate closure to reflect its unavailability following an activation of reserve;
- (ii) Refine the existing gate closure exemption - for a GRF that has experienced a forced outage to reflect its revised capability after gate closure - allow the GRF to reflect its reduced capability after gate closure for only the first 3 periods following the forced outage; and
- (iii) Expand the gate closure exemptions to include two other proposed exemptions, namely
 - To reflect a GRF’s revised capability when it fails to synchronise
 - To increase energy, reserve or regulation supply if it improves a shortfall situation, for which a High-Risk Operating State (HOS) system status advisory notice is in effect.

Sections 3.1 to 3.3 of this paper reproduce the analysis of the proposals in CP74 and CP75 that has led to these proposed changes to the gate closure exemptions.

3.1 For LRFs to revise offers after reserve activation

EMC **recommended** that the gate closure exemptions be expanded to allow an LRF to revise its reserve offers within gate closure to reflect its unavailability following an activation of reserve, similar to (i) how GRFs are allowed to revise offers immediately after a forced outage event, and

¹ RC314: Exceptions to Gate Closure During an Emergency Operating State <https://www.emcsg.com/f1027,77844/EMC314-EMA-LL.pdf>

² Rules Modification for EMA’s “Implementing Demand Response in the National Electricity Market of Singapore” https://www.emcsg.com/f127,112211/335-ImplementingDR_Publication_-_Market_Rules.pdf

(ii) how LRFs are allowed to revise energy bids following activation of reserve, in order for dispatch schedules produced by the MCE to correctly reflect LRFs' capabilities to provide reserve.

Currently, the rules do not allow LRFs to revise reserve offers after gate closure immediately after a reserve activation. This has an adverse impact on both system security and interruptible load (IL) service providers.

LRFs are required to maintain their scheduled reserve throughout a dispatch period in accordance with the compliance requirement set out in the SOM. When an LRF is activated to provide reserve in a dispatch period, its capability to provide reserve in the subsequent dispatch periods is likely to be reduced, considering that it may not be allowed to restore its load so promptly. If the LRF continues to be scheduled to provide reserve in these subsequent dispatch periods, it will not be able to maintain the scheduled reserve, which constitutes a non-compliance incident.

System security

This could result in reserve being procured in those subsequent dispatch periods from LRFs which are not physically available to provide reserve in a contingency event. This could potentially lead to inadequate reserve being available from reserve providers, which would pose a risk to system security.

Penalty for IL Service Providers

The EMA, in its determination paper on "Enhancement to Interruptible Load scheme"³ published on 8 August 2018, had decided to introduce a financial penalty for each period of non-compliance by IL service providers at a penalty rate of \$2,500/MWh.

If an LRF's offer is not revised and the LRF continues to be scheduled to provide reserve but is subsequently unable to comply, the IL service provider will face hefty financial penalties once this penalty scheme is implemented.

3.2 For GRFs that experienced forced outage to revise offers for 1st 3 periods only

EMC **recommended** that the existing gate closure exemption clause relating to GRFs during a forced outage to allow a GRF to reflect its reduced capability i.e. change its offer quantities downwards after gate closure for only the first 3⁴ periods following the forced outage.

Currently, during forced outage, unlimited downward offer revisions after gate closure are allowed. It was thus observed that GRFs that have experienced forced outages and are eager to reoffer could exhibit the following currently allowable offer revision behaviour:

Behaviour 1 – withdraw offers for many periods after forced outage, then reoffer before gate closure only to withdraw offers after gate closure when they realise they are unable to recover from the forced outage in time.

Behaviour 2 – withdraw offers for only a few periods after forced outage, then gradually withdraw offers (when they are still unable to recover from the forced outage) or reduce offered quantity (when they are able to recover from the forced outage respectively) after gate closure for subsequent periods.

³ https://www.ema.gov.sg/cmsmedia/Final%20Determination%20Paper_Enhanced%20IL%20Scheme%20vf.pdf

⁴ This is to cater for the scenario where the forced outage occurs late in period T e.g. 12:28 such that the offers can only be changed after the RTDS is run for the upcoming period T+1 e.g. 12:40. The MP may need to revise its offer quantities downwards after gate closure for the upcoming periods T+2 (starting at 13:00) and T+3 (starting at 13:30), and will be allowed to do so.

To illustrate the different offer revision behaviour, we use an example where a forced outage occurred to a generator at 12:28 (P25), and the time and total quantities of offer submissions are shown in Table 1 below. Cells are shaded orange to reflect revisions to the total offer quantities that occurred after gate closure.

Table 1: Time and Total Quantities of Offer Submissions

Time	13:00 - 13:30	13:30 - 14:00	14:00 - 14:30	14:30 - 15:00	15:00 - 15:30	15:30 - 16:00
Period	P27	P28	P29	P30	P31	P32
GC	11:55	12:25	12:55	13:25	13:55	14:25
Received at	Total Offer Quantities					
08:00	300	300	300	300	300	300
Behaviour 1	12:35	0	0	0	0	0
	12:54	-	-	150	300	300
	13:45			0	150	-
Behaviour 2	12:35	0	0	-	-	-
	13:25		-	150	-	-
	13:45			0	150	-
Desired Behaviour	12:35	0	0	0	0	0
	13:45			-	-	150

Behaviour 1 and 2 give both the power system and the market a false sense of security in forecast schedules and should be avoided. Such behaviour is a result of the unlimited downward offer revisions after gate closure currently allowed during forced outage which encourages irresponsible offering.

The Desired Behaviour of a GRF during a forced outage is the withdrawal of its offers for many periods after the forced outage, followed by the submission of its reoffer before gate closure for the period in which it is certain of a recovery from the forced outage and ready to resynchronise and generate. In this way, the GRF can prioritise the assessment and resolution of forced outage after the withdrawal of its offers upon forced outage, instead of rushing to reoffer in an uncertain manner.

By allowing downward offer quantity revisions after gate closure only for the first few periods immediately following the occurrence of each forced outage in the first place, we can encourage the Desired Behaviour. Any downward offer quantity revisions after the first few periods need to be done before gate closure. It is reasonable to assume that beyond these initial periods, the GRF would already be able to foresee its physical capability for the upcoming periods and change its offers accordingly before gate closure, unless circumstances that are already or will be provided for in the existing or recommended exemptions (see next section) for offer changes after gate closure arise.

For example, if a repeat forced outage occurs to the same unit (or the unit fails to synchronise), downward offer quantity revisions after gate closure will then be allowed by virtue of these other

existing (or recommended) gate closure exemptions. Apart from these gate closure exemptions, other circumstances do not warrant a breach of gate closure by the unit to change its offer quantities downwards.

3.3 Other proposed exemptions

EMC **recommended** that the gate closure exemptions be expanded to also include the two other gate closure exemptions proposed by the industry. The proposed exemptions and EMC's assessment are as follows:

Proposed Exemption & Reason(s) (if any)	EMC's Assessment	Recommend?
<p>For a GRF to reflect its revised capability when it fails to synchronise</p> <p>Reasons:</p> <ul style="list-style-type: none"> There could be some unforeseen issues that occur prior to synchronising and discovered only 1 or 2 periods before the dispatch period As the entire synchronisation process may take a few periods in various loading levels, it is important that the generator immediately changes its offers for the upcoming periods if it cannot synchronise and generate according to the schedules 	<p>Synchronisation to the grid is an essential first step for a GRF to subsequently be able to generate in adherence to its schedule in the following periods. Hence, a GRF's failure to synchronise poses the same risk as a forced outage, in which the unforeseen reduction in the physical capability of the unit ought to be reflected after gate closure in offers so that system security risks can be circumvented by the scheduling of other facilities to cover the shortfall.</p> <p>The Market Surveillance and Compliance Panel (MSCP), in its investigation of gate closure violations arising from the GRFs' failure to synchronise, can verify with the PSO on this as the GRFs' dispatch coordinators are required to have sought the PSO's approval for synchronisation.</p>	Yes ⁵
<p>To increase energy, reserve or regulation supply if it improves a shortfall situation for which a High-risk Operating State (HOS) system status advisory notice is in effect (i.e. has been issued and not yet withdrawn)</p>	<p>The existing exemption that allows facilities to vary offers or bids after gate closure to contribute positively to the resolution of energy, reserve or regulation shortfalls in an emergency operating state (EOS) was introduced in 2012 by RC314: Exceptions to Gate Closure During an EOS.</p> <p>RC314 concluded that the exemption has merit (a) if it does not aggravate system operation while eliminating the delays/gaps in the gate closure regime⁶, and (b) if the exemption is implemented, the system advisory notices can state the product responsible. With PSO's confirmation on the 2 items above, the existing exemption was introduced.</p> <p>For the same reason, we recommend for this exemption to extend to include HOS, subject to the PSO's confirmation on the 2 items for HOS.</p>	Yes, received the PSO's confirmation

⁵ Similarly, a GRF that fails to synchronise should be allowed to reflect its reduced capability in its offers after gate closure for only the first 3 periods following its failure to synchronise.

⁶ System status advisories (EOS and HOS) can be issued any time, unlike market advisories that are issued at fixed intervals aligned with the dispatch or forecast runs. Hence, allowing facilities to vary offers or bids after gate closure to contribute positively to the resolution of shortfalls for which system status advisories are in effect allows the system to benefit from greater responsiveness.

4. Decisions at 105th and 106th RCP Meetings

Having considered the concept papers CP74 and CP75, the RCP **supported** the proposed changes to the gate closure exemptions as follows:

Proposed Changes to Gate Closure Exemption	Tabled at RCP meeting	Supported by RCP
(i) Expand the gate closure exemptions to allow an LRF to revise its reserve offers within gate closure to reflect its unavailability following an activation of reserve	105 th – CP74 Restoration of Load Registered Facilities Activated to Provide Reserve	By majority vote
(ii) Refine the existing gate closure exemption - for a GRF that has experienced a forced outage to reflect its revised capability after gate closure - allow the GRF to reflect its reduced capability after gate closure for only the first 3 periods following the forced outage;	106 th – CP75 Review of Gate Closure Rules	By majority vote
(iii) Expand the gate closure exemptions to include two other proposed exemptions, namely <ul style="list-style-type: none"> To reflect a GRF's revised capability when it fails to synchronise To increase energy, reserve or regulation supply if it improves a shortfall situation, for which a High-Risk Operating State (HOS) system status advisory notice is in effect. 		Unanimously

The details of the voting outcomes are as follows:

Table 2: Summary of Voting Outcomes at RCP Meetings

RCP Member	105 th RCP Meeting		106 th RCP Meeting	
		(i) For LRFs to revise offers after reserve activation	(ii) For GRFs to revise offers after forced outage for 1 st 3 periods only	(iii) For 2 other gate closure exemptions to be included
Representative of EMC	Mr. Henry Gan	Support	Support	Support
Representative of PSO	Mr. Soh Yap Choon	Support	Support	Support
Representative of Generation Licensee	Mr. Tan Jun Jie	Support	Support	Support
	Mr. Tony Tan	Absent	Do not support	Support
	Mr. Teo Chin Hau	Support	Do not support	Support
Representative of Retail Electricity Licensee	Mr. Sean Chan	Support	Support	Support
	Mr. Vijay Sirse	Support	Support	Support
	Mr. Daniel Au	NA	Do not support	Support
Representative of Wholesale Electricity Trader	Mr. Matthew Yeo	Support	Support	Support
Representative of market support services licensee	Ms. Ho Yin Shan	Support	Support	Support
Representative of transmission licensee	Ms. Carol Tan	Support	Support	Support
Person experienced in Financial Matters in Singapore	Mr. Tan Chian Khong	Support	Abstain	Support
Representative of Consumers of Electricity in Singapore	Dr. Toh Mun Heng	Abstain	Absent	Absent
	Mr. YK Fong	Abstain	Abstain	Support
Decision		By majority vote support	By majority vote support	Unanimously support

5. Proposed Rule Modifications

Arising from the RCP’s decisions in section 4, EMC drafted the proposed rule modifications to implement the changes to the gate closure exemptions. The modifications are set out in Annex 1 and summarised in Table 3.

Table 3: Summary of Proposed Modifications

S/N	Chapter/Section	Proposed Changes	Reasons for Change
1	Chapter 6 Section 10.4.1.1 (b)	<ul style="list-style-type: none"> ▪ Add that the offer changes after gate closure are also allowed for a GRF to reflect its revised capability following its failure to synchronise ▪ Specify that the offer changes after gate closure are allowed only a GRF for the three consecutive periods following its forced outage or its failure to synchronise 	<ul style="list-style-type: none"> ▪ To allow a market participant (MP) to submit offer changes within gate closure for its GRF to reflect its revised capability following its failure to synchronise as well. ▪ To make clear that a MP can submit offer changes within gate closure for its GRF to reflect its revised capability only for the three consecutive periods immediately following its forced outage or its failure to synchronise.
2	Chapter 6 Sections 10.4.1.1 (e)(i) and 10.4.2.1 (c)(i)	Add that offer and bid changes after gate closure are allowed to improve shortfall situations indicated by system status advisory notices in respect of high-risk operating state as well	To allow a MP to submit offer and bid changes within gate closure to contribute positively to the resolution of shortfall situations in the period where the shortfall situations were indicated in a system status advisory notice issued by the EMC in respect of a high-risk operating state declared by the PSO as well.
3	Chapter 6 Section 10.4.1.1 (f)	Add that (reserve) offer changes after gate closure are allowed for a LRF to reflect its revised capability following its forced outage or a decrease in its energy withdrawal arising from reserve activation	To allow a MP to submit (reserve) offer changes within gate closure for its LRF to reflect its revised (reserve) capability following a forced outage or a decrease in energy withdrawal upon reserve activation.

6. Conclusion

We conclude that the proposed rule modifications would implement the proposed changes to the gate closure exemptions.

7. Implementation Time & Cost Estimates

For the proposed revisions to the gate closure exemptions, no change to the market systems is required as currently, all changes to offers and bids made after gate closure are already required to be reported to the Market Assessment Unit, and the MSCP will then make the determination whether the reasons for such changes fall within the premises of the revised gate closure exemptions.

8. Legal Sign-Off

The text of the proposed rule modifications in **Annex 1** has been vetted by EMC's internal legal counsel, whose opinion is that the modifications reflect the intent of the rule modification proposal as expressed in the third column of the table in **Annex 1**.

9. Consultation

The proposed rule modifications were published for consultation on 01 February 2019, and no comment was received.

10. Decision at the 107th RCP Meeting

At the 107th RCP meeting, the Panel **unanimously supported** the proposed rule modifications set out in **Annex 1**.

11. Recommendations

The RCP **unanimously** recommends that the EMC Board:

- a) **adopts** the proposed rule modifications as set out in **Annex 1**;
- b) **seeks** the EMA's approval of the proposed rule modifications as set out in **Annex 1**; and
- c) **recommends** that the proposed rule modifications as set out in **Annex 1** come into force on the date on which the approval of the Authority is published by the EMC.

ANNEX 1: Proposed Rule Modifications

Existing Market Rules (1 Jan 2019)	Proposed Rules Changes (Deletions represented by strikethrough text and additions represented by double underlined text)	Reasons for Rule Changes
Chapter 6	Chapter 6	
10 EMC RESPONSIBILITIES AFTER EACH DISPATCH PERIOD	10 EMC RESPONSIBILITIES AFTER EACH DISPATCH PERIOD	
<p>10.4 <u>GATE CLOSURE</u></p> <p>10.4.1 Notwithstanding sections 5.1.5, 5.1.6 and 5.1.7, no <i>offer variation</i> or revised <i>standing offer</i> shall be submitted by or for a <i>market participant</i> within 65 minutes immediately prior to the <i>dispatch period</i> to which the <i>offer variation</i> or revised <i>standing offer</i> applies, except:</p> <p>10.4.1.1 where it is intended:</p> <ul style="list-style-type: none"> a. for a <i>generation registered facility</i>, to reflect its expected ramp-up and ramp-down profiles during periods following <i>synchronisation</i> or preceding <i>desynchronisation</i>; or b. for a <i>generation registered facility</i>, to reflect its revised capability during a <i>forced outage</i>; or 	<p>10.4 <u>GATE CLOSURE</u></p> <p>10.4.1 Notwithstanding sections 5.1.5, 5.1.6 and 5.1.7, no <i>offer variation</i> or revised <i>standing offer</i> shall be submitted by or for a <i>market participant</i> within 65 minutes immediately prior to the <i>dispatch period</i> to which the <i>offer variation</i> or revised <i>standing offer</i> applies, except:</p> <p>10.4.1.1 where it is intended:</p> <ul style="list-style-type: none"> a. for a <i>generation registered facility</i>, to reflect its expected ramp-up and ramp-down profiles during periods following <i>synchronisation</i> or preceding <i>desynchronisation</i>; or b. for a <i>generation registered facility</i>, to reflect its revised capability <u>for the three consecutive dispatch periods immediately following</u> during a forced outage <u>or its failure to synchronise</u>; or 	<p>To allow a market participant to submit offer changes within gate closure for its GRF to reflect its revised capability following its failure to synchronise as well.</p>

Existing Market Rules (1 Jan 2019)	Proposed Rules Changes (Deletions represented by strikethrough text and additions represented by double underlined text)	Reasons for Rule Changes
<p>c. to contribute positively to the resolution of an <i>energy</i> surplus situation pertaining to which the <i>EMC</i> has issued an <i>advisory notice</i> under section 9.3.1, by allowing for decreased supply of <i>energy</i>; or</p> <p>d. to contribute positively to the resolution of <i>energy</i>, <i>reserve</i> or <i>regulation</i> shortfall situations pertaining to which the <i>EMC</i> has issued <i>advisory notices</i> under section 9.3.1, by allowing for increased supply of <i>energy</i>, <i>reserve</i> or <i>regulation</i>; or</p> <p>e. to contribute positively to the resolution of <i>energy</i>, <i>reserve</i> or <i>regulation</i> shortfall situations in that <i>dispatch period</i>, where:</p> <p>(i) the shortfall situations were indicated in a system status <i>advisory notice</i> issued by the <i>EMC</i> in respect of an <i>emergency operating state</i> declared by the <i>PSO</i>; and</p> <p>(ii) at the time of submission of such <i>offer variation</i> or revised <i>standing offer</i>, the <i>EMC</i> has not yet withdrawn, in respect of that</p>	<p>c. to contribute positively to the resolution of an <i>energy</i> surplus situation pertaining to which the <i>EMC</i> has issued an <i>advisory notice</i> under section 9.3.1, by allowing for decreased supply of <i>energy</i>; or</p> <p>d. to contribute positively to the resolution of <i>energy</i>, <i>reserve</i> or <i>regulation</i> shortfall situations pertaining to which the <i>EMC</i> has issued <i>advisory notices</i> under section 9.3.1, by allowing for increased supply of <i>energy</i>, <i>reserve</i> or <i>regulation</i>; or</p> <p>e. to contribute positively to the resolution of <i>energy</i>, <i>reserve</i> or <i>regulation</i> shortfall situations in that <i>dispatch period</i>, where:</p> <p>(i) the shortfall situations were indicated in a system status <i>advisory notice</i> issued by the <i>EMC</i> in respect of a <u><i>high-risk operating state</i></u> or <i>emergency operating state</i> declared by the <i>PSO</i>; and</p> <p>(ii) at the time of submission of such <i>offer variation</i> or revised <i>standing offer</i>, the <i>EMC</i> has not yet</p>	<p>To make clear that a market participant can submit offer changes within gate closure for its GRF to reflect its revised capability only for the three consecutive periods immediately following its forced outage or its failure to synchronise.</p> <p>To allow a market participant to submit offer changes within gate closure to contribute positively to the resolution of shortfall situations in the period where the shortfall situations were indicated in a system status advisory notice issued by the EMC in respect of a high-risk operating state</p>

Existing Market Rules (1 Jan 2019)	Proposed Rules Changes (Deletions represented by strikethrough text and additions represented by double underlined text)	Reasons for Rule Changes
<p><i>dispatch period</i>, such system status <i>advisory notice</i>,</p> <p>by allowing for increased supply of <i>energy, reserve or regulation</i>; and</p> <p>10.4.1.2 where the price so <i>offered</i>, other than for additional quantities of <i>energy, reserve or regulation</i>, is the same as that previously <i>offered</i> for that <i>dispatch period</i>.</p>	<p>withdrawn, in respect of that <i>dispatch period</i>, such system status <i>advisory notice</i>,</p> <p>by allowing for increased supply of <i>energy, reserve or regulation</i>; and <u>or</u></p> <p><u>f. 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</u></p> <p>10.4.1.2 where the price so <i>offered</i>, other than for additional quantities of <i>energy, reserve or regulation</i>, is the same as that previously <i>offered</i> for that <i>dispatch period</i>.</p>	<p>declared by the PSO as well.</p> <p>To allow a market participant to submit (reserve) offer changes within gate closure for its LRF to reflect its revised (reserve) capability following a forced outage or a decrease in energy withdrawal upon reserve activation.</p>
<p>10.4.2 Notwithstanding sections 5.1A.2, 5.1A.3 and 5.1A.4, no <i>bid variation</i> or revised <i>standing bid</i> shall be submitted by or for a <i>market participant</i> within 65 minutes immediately prior to the <i>dispatch period</i> to which the <i>bid variation</i> or revised <i>standing bid</i> applies, except:</p> <p>10.4.2.1 where it is intended:</p> <p>a. for a <i>load registered facility</i> to reflect its revised capability during a <i>forced outage</i> or following a decrease in <i>energy withdrawal</i> under section 9.3.3 and 9.3.4 of Chapter 5;</p>	<p>10.4.2 Notwithstanding sections 5.1A.2, 5.1A.3 and 5.1A.4, no <i>bid variation</i> or revised <i>standing bid</i> shall be submitted by or for a <i>market participant</i> within 65 minutes immediately prior to the <i>dispatch period</i> to which the <i>bid variation</i> or revised <i>standing bid</i> applies, except:</p> <p>10.4.2.1 where it is intended:</p> <p>a. for a <i>load registered facility</i> to reflect its revised capability during a <i>forced outage</i> or following a decrease in <i>energy withdrawal</i> under sections <u>9.3.3 and/or</u> 9.3.4 of Chapter 5; <u>or</u></p>	

Existing Market Rules (1 Jan 2019)	Proposed Rules Changes (Deletions represented by strikethrough text and additions represented by double underlined text)	Reasons for Rule Changes
<p>b. to contribute positively to the resolution of <i>energy</i> shortfall situations pertaining to which the <i>EMC</i> has issued <i>advisory notices</i> under section 9.3.1, by allowing for increased quantities in its <i>energy bids</i>; or</p> <p>c. to contribute positively to the resolution of <i>energy</i> shortfall situations in that <i>dispatch period</i>, where:</p> <p>(i) the shortfall situations were indicated in a system status <i>advisory notice</i> issued by the <i>EMC</i> in respect of an <i>emergency operating state</i> declared by the <i>PSO</i>; and</p> <p>(ii) at the time of submission of such <i>bid variation</i> or revised <i>standing bid</i>, the <i>EMC</i> has not yet withdrawn, in respect of that <i>dispatch period</i>, such system status <i>advisory notice</i>,</p> <p>by allowing for increased quantities in its <i>energy bids</i>; and</p> <p>10.4.2.2 where the price so <i>bidden</i>, other than for additional quantities of <i>energy</i>, is the same as that previously <i>bidden</i> for that <i>dispatch period</i>.</p>	<p>b. to contribute positively to the resolution of <i>energy</i> shortfall situations pertaining to which the <i>EMC</i> has issued <i>advisory notices</i> under section 9.3.1, by allowing for increased quantities in its <i>energy bids</i>; or</p> <p>c. to contribute positively to the resolution of <i>energy</i> shortfall situations in that <i>dispatch period</i>, where:</p> <p>(i) the shortfall situations were indicated in a system status <i>advisory notice</i> issued by the <i>EMC</i> in respect of a <u><i>high-risk operating state</i></u> or <i>emergency operating state</i> declared by the <i>PSO</i>; and</p> <p>(ii) at the time of submission of such <i>bid variation</i> or revised <i>standing bid</i>, the <i>EMC</i> has not yet withdrawn, in respect of that <i>dispatch period</i>, such system status <i>advisory notice</i>,</p> <p>by allowing for increased quantities in its <i>energy bids</i>; and</p> <p>10.4.2.2 where the price so <i>bidden</i>, other than for additional quantities of <i>energy</i>, is the</p>	<p>To allow a market participant to submit bid changes within gate closure to contribute positively to the resolution of shortfall situations in the period where the shortfall situations were indicated in a system status advisory notice issued by the EMC in respect of a high-risk operating state declared by the PSO as well.</p>

Existing Market Rules (1 Jan 2019)	Proposed Rules Changes (Deletions represented by strikethrough text and additions represented by double underlined text)	Reasons for Rule Changes
	same as that previously <i>bidden</i> for that <i>dispatch period</i> .	