FACTS AND CIRCUMSTANCES


2. SKRA G2 was on commissioning start-up when it tripped at period 20 (09:33 hrs) on 30 November 2019, as its compressor bleed valve was not closed.

3. At period 20 (09:59 hrs), Sembcorp Cogen’s trader was informed by its Operations team that SKRA G2’s compressor bleed valve could be fixed and SKRA G2 would be ready to be resynchronised to the grid immediately, subject to the Power System Operator’s (“PSO”) approval.

4. Sembcorp Cogen’s trader did not receive any subsequent communication from its Operations team on the resynchronisation request until period 22 (10:40 hrs), when it was informed that the PSO did not allow SKRA G2 to be resynchronised to the grid. The trader proceeded to submit offer variations to withdraw SKRA G2 from the grid from periods 23 to 48 on 30 November 2019.

5. As 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 the forced outage, the offer variation submitted after gate closure for period 24 was not in compliance given that SKRA G2 experienced the forced outage at period 20.
6. Additionally, Sembcorp Cogen failed to submit offer variations to reflect the generating capability of SKRA G2 for periods 21 and 22. However, given that Sembcorp Cogen’s trader was only informed of SKRA G2’s unavailability at 09:59 hrs and the computation for real-time dispatch schedule for period 21 had already started at 09:55 hrs, it was not possible for Sembcorp Cogen to revise its offers for period 21.

7. As a remedial measure to this incident, Sembcorp Cogen submitted that it is reviewing the protocol of such unique cases (e.g. an immediate trip after commissioning start-up) and aims to improve the communication between its traders and Operations team. Sembcorp Cogen had also emphasised the relevant sections of the Market Rules to its plant operators to minimise the occurrences of such non-compliance.

8. On 6 April 2020, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform Sembcorp Cogen that it considered Sembcorp Cogen to be in *prima facie* breach of section 5.1.6 of Chapter 6 of the Market Rules for period 22 and section 10.4.1 of Chapter 6 of the Market Rules for period 24 on 30 November 2019. The MSCP invited Sembcorp Cogen to submit written representations by 20 April 2020 before the MSCP makes a determination.

9. On 15 April 2020, Sembcorp Cogen submitted its written representations to the MSCP, providing the additional information below:

   a. Sembcorp Cogen is reviewing the mandatory protocol to withdraw offers for no less than three periods for the generation facility which experienced a forced outage.

   b. Sembcorp Cogen does not require a hearing.

**APPLICABLE MARKET RULES**

10. **Section 5.1.6 of Chapter 6 provides that**

    Subject to section 10.4.1, for each dispatch period that a registered facility is not synchronised and until the earliest dispatch period in which it would be possible for that registered facility to be synchronised, its dispatch coordinator shall:

    5.1.6.1 submit offer variations where there are existing offer variations; or

    5.1.6.2 submit revised standing offers where there are no offer variations,

    so that all the offered quantities are zero.

11. **Section 10.4.1 of Chapter 6 provides that**

    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. 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

d. 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

e. 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

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

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 referred to above, the MSCP determined that Sembcorp Cogen had breached section 5.1.6 of Chapter 6 of the Market Rules for period 22 and section 10.4.1 of Chapter 6 of the Market Rules for period 24 on 30 November 2019.

13. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore. Sembcorp Cogen had also taken remedial actions following the incident.

14. Nonetheless, the incident could have been avoided if there had been clear and timely communication between Sembcorp Cogen’s traders and its Operations team.
15. The MSCP hereby imposes a financial penalty of $8,000 on Sembcorp Cogen and directs Sembcorp Cogen to pay costs fixed at $1,500.

T P B Menon
Chair, Market Surveillance and Compliance Panel