DETERMINATION OF THE MARKET SURVEILLANCE AND COMPLIANCE PANEL
MSCP/2020/D5

Market Surveillance and Compliance Panel
Mr. T P B Menon, Chair
Er. Lee Keh Sai
Mr. Philip Chua
Professor Euston Quah
Professor Walter Woon

Date of Determination
11 May 2020

Party
Senoko Energy Pte Ltd

Subject
Failure to comply with gate closure rules on 3 December 2019

FACTS AND CIRCUMSTANCES


2. Senoko Energy had intended to submit offer variations for SNKCCP6 for period 28 due to a technical reason. The offer variation was submitted at 12:45pm (period 26), but this was wrongly submitted for SNKCCP2 (instead of SNKCCP6) for period 27 (instead of period 28).

3. Senoko Energy explained that the incident occurred even though there were prompts from the trading system. Due to time pressure and given that this was the first time the trader submitted offer variations after gate closure, the trader proceeded with the unintentional offer variation for SNKCCP2 for period 27.

4. As a remedial action to this incident, Senoko Energy has reminded its duty traders the importance of compliance with the Market Rules and to be more careful in the future. The affected trader had also been retrained on submitting offer variations after gate closure to avoid a repeat of such situation.

5. On 6 April 2020, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform Senoko Energy that it considered Senoko Energy to be in prima facie breach of section 10.4.1 of Chapter 6 of the Singapore Electricity Market Rules (“Market Rules”) for period 27 on 3 December 2019. The MSCP invited Senoko Energy to submit written representations by 20 April 2020 before the MSCP makes a determination.
6. On 16 April 2020, Senoko Energy submitted its written representations to the MSCP. There was no new information submitted and Senoko Energy indicated that it does not require a hearing before the MSCP.

APPLICABLE MARKET RULES

7. 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

8. Based on the facts referred to above, the MSCP determined that Senoko Energy had breached section 10.4.1 of Chapter 6 of the Market Rules for period 27 on 3 December 2019.

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

10. However, this is a repeated breach by Senoko Energy and the incident was due to carelessness which could have been avoided if Senoko Energy exercised care in its offer submission.

11. The MSCP hereby imposes a financial penalty of $10,000 on Senoko Energy and directs Senoko Energy to pay costs fixed at $1,500. The MSCP takes a serious view on the repeated nature of the breach by Senoko Energy and sternly reminds Senoko Energy of its obligation to ensure compliance with the Market Rules.

T P B Menon
Chair, Market Surveillance and Compliance Panel