FACTS AND CIRCUMSTANCES


2. On 16 November 2020 at 21:01 hrs (period 43), EMC received a system alert indicating a potential issue with respect to the dispatch processing. EMC commenced investigations immediately. At 21:40 hrs (period 44), EMC performed a system health check and did not detect any anomalies. There were also no suspicious cyber-security activities detected on the affected server and production environment.

3. After investigation, EMC determined that the cause of the incident was due to the change made to the default permissions of the folder containing the STS files. A more stringent file permission for the period 44 STS files was applied as a result of the recommendations by EMC’s external auditor. As a result, the programme was unable to read and send the period 44 STS files to the PSO due to a lack of access rights.

4. EMC resolved the incident on 18 November by rolling back the change and restarting the database listener service. After the restart, EMC verified that the STS for subsequent periods were successfully dispatched.
5. To prevent a similar incident from occurring, EMC undertook remedial actions to brief its staff on the incident and advised them to exercise due care and consideration, in the event that a similar request is put up in the future for a change in file permissions. EMC also updated its internal reference documentation.

6. On 1 February 2021, the Market Surveillance and Compliance Panel (“MSCP”) wrote to inform EMC that it considered EMC to be in prima facie breach of section 7.7.2A.3 of Chapter 6 of the Market Rules for period 44 on 16 November 2020. The MSCP invited EMC to submit written representations by 15 February 2021 before the MSCP makes a determination.

7. On 15 February 2021, EMC submitted its written representations to the MSCP. In the written representations, EMC provided a recap of the following:

   a. the immediate responses which EMC had taken to mitigate any adverse consequences arising from the incident;
   
   b. the rigorous testing which EMC had conducted prior to implementation of the system changes. There were no observations or findings detected during the testing regime which might have led EMC to anticipate the likelihood of the occurrence of the incident; and
   
   c. the immediate implementation of the follow-up actions following the incident to minimise the likelihood of recurrence.

8. EMC also informed that information on the incident was shared at the Market Systems User Group forum on 17 December 2020. No queries on the incident were raised by participants at the forum.

9. EMC was of the view that a hearing was not necessary unless the MSCP required any further clarification.

APPLICABLE MARKET RULES

10. Section 7.7.2A of Chapter 6 provides that

    Not later than 25 minutes prior to the commencement of the first dispatch period of the short-term schedule referred to in section 7.4A, the EMC shall, for each dispatch period included in the short-term schedule:

    7.7.2A.1 release to the dispatch coordinator for each registered facility the projected schedules for energy, regulation and reserve, by reserve class, for that registered facility;

    7.7.2A.2 publish the information described in section 7.7.3; and

    7.7.2A.3 communicate to the PSO the projected schedules for energy, regulation and reserve, by reserve class, for each registered facility, together with the information described in section 7.7.3, in accordance with the system operation manual and any applicable market manual.
ENFORCEMENT

11. The MSCP determined based on the facts referred to above that EMC had breached section 7.7.2A.3 of Chapter 6 of the Market Rules on 16 November 2020.

12. The incident was self-reported and did not have any financial and operational impact on the National Electricity Market of Singapore as the real-time schedule for period 44 was used by the PSO for dispatching the generators and the STS for period 44 was still produced and published.

13. In view of the above, the MSCP hereby imposes a letter of non-compliance and directs EMC to pay costs fixed at $2,000. The MSCP also reminds EMC to be more diligent in ensuring that an issue that led to a breach of the Market Rules is successfully resolved without having a recurrence.

T P B Menon
Chair, Market Surveillance and Compliance Panel