FACTS AND CIRCUMSTANCES


2. On 22 September 2020 and 30 September 2020, Energy Market Company Pte Ltd ("EMC") sent an email notification reminder to the industry that a disaster recovery preparedness ("DRP") switchback exercise was planned for the National Electricity Market of Singapore ("NEMS") portal on 1 October 2020, from 18:10 hours to 21:10 hours and a planned contingency window from 21:10 hours to 23:10 hours. In conjunction with the switchback exercise, the Network Technology Refresh ("NTR") Project, Market Clearing Engine Server Migration with Cplex Version upgrade, T1 Storage upgrade, Single Electronic Window server upgrade and application deployments were rolled out as well.

3. On 1 October 2020, the DRP switchback exercise extended into its contingency window and ended at 23:10 hours. During the switchback exercise, the offer submission system remained unavailable to all market participants.

4. ExxonMobil acknowledged that there was an oversight and the email reminders on the DRP exercise from EMC were being overlooked. This resulted in the need to submit the offers after gate closure for the two embedded generation facilities in order to reflect the actual physical statuses of the plants.
5. On 1 February 2021, the Market Surveillance and Compliance Panel ("MSCP") wrote to inform ExxonMobil that it considered ExxonMobil to be in prima facie breach of section 10.4.1 of Chapter 6 of the Market Rules for period 1 on 2 October 2020. The MSCP invited ExxonMobil to submit written representations by 15 February 2021 before the MSCP makes a determination.

6. On 15 February 2021, ExxonMobil requested for an extension of the due date for the submission of its written representation. On 18 February 2021, ExxonMobil submitted its written representations to the MSCP, providing the information below:

a. At all times, ExxonMobil sought to adhere to the Market Rules but due to an administrative error, overlooked the email notices on the DRP exercises from EMC;

b. ExxonMobil expects to improve its market rule compliance with the measures in place and improved their vigilance for such DRP exercises alert from EMC; and

c. ExxonMobil has conducted investigation and training to improve the response to prevent repeat of the incidence.

d. ExxonMobil does not require a hearing.

**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 ExxonMobil had breached section 10.4.1 of Chapter 6 of the Market Rules for period 1 on 2 October 2020.

9. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore (“NEMS”). ExxonMobil had also taken remedial actions following the incident.

10. In view of the repeated nature of rule breach committed, the MSCP hereby imposes a financial penalty of $10,000 on ExxonMobil and directs ExxonMobil to pay costs fixed at $2,000.

11. The MSCP reiterates that it takes a serious view on any behaviour which undermines the effective functioning of the NEMS and sternly reminds ExxonMobil of its duties as a Market Participant to observe the Market Rules at all times.

T P B Menon  
Chair, Market Surveillance and Compliance Panel