FACTS AND CIRCUMSTANCES


2. On 15 January 2021 at 10:09 hrs (period 21), KEPPEL GENR experienced a forced outage caused by a number of bad signals from the plant common system of the distributed control system (“DCS”). At 10:40 hrs (period 22), TDT completed the replacement of the faulty input/output (“IO”) module that was causing the bad signals in the DCS.

3. According to TDT, the whole system had to be put back in operation as soon as possible so as to determine if the bad signals will re-appear after the replacement of the IO module. This was necessary to investigate the extent of damage, as well as to prevent any further plant damage.

4. As such, TDT submitted an offer variation at 10:48 hrs (period 22) to reflect the synchronisation of the unit. The offer variation for period 24 involving an increase in offer within the gate closure window was not allowed under the Singapore Electricity Market Rules (“Market Rules”).

5. TDT also said that its operations staff had misunderstood that he was allowed to synchronise the unit without breaching the gate closure provisions in the Market Rules if the Power System Operator was informed and provided its approval.
6. On 29 March 2021, the MSCP wrote to inform TDT that it considered TDT to be in \textit{prima facie} breach of section 10.4.1 of Chapter 6 of the Market Rules for period 24 on 15 January 2021. The MSCP invited TDT to submit written representations by 12 April 2021 before the MSCP makes a determination.

7. TDT did not submit written representations or request for a hearing.

**APPLICABLE MARKET RULES**

8. 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 \textit{generation registered facility}, to reflect its expected ramp-up and ramp-down profiles during periods following \textit{synchronisation} or preceding \textit{desynchronisation}; or

   b. for a \textit{generation registered facility}, to reflect its revised capability for the three consecutive \textit{dispatch periods} immediately following a \textit{forced outage} or its failure to \textit{synchronise}; or

   c. to contribute positively to the resolution of an \textit{energy} surplus situation pertaining to which the \textit{EMC} has issued an \textit{advisory notice} under section 9.3.1, by allowing for decreased supply of \textit{energy}; or

   d. to contribute positively to the resolution of \textit{energy}, \textit{reserve} or \textit{regulation} shortfall situations pertaining to which the \textit{EMC} has issued \textit{advisory notices} under section 9.3.1, by allowing for increased supply of \textit{energy}, \textit{reserve} or \textit{regulation}; or

   e. to contribute positively to the resolution of \textit{energy}, \textit{reserve} or \textit{regulation} shortfall situations in that \textit{dispatch period}, where:

      i. the shortfall situations were indicated in a system status \textit{advisory notice} issued by the \textit{EMC} in respect of a \textit{high-risk operating state} or \textit{emergency operating state} declared by the \textit{PSO}; and

      ii. at the time of submission of such \textit{offer variation} or revised \textit{standing offer}, the \textit{EMC} has not yet withdrawn, in respect of that \textit{dispatch period}, such system status \textit{advisory notice}, by allowing for increased supply of \textit{energy}, \textit{reserve} or \textit{regulation}; and

   f. for a \textit{load registered facility}, to reflect its revised capability during a \textit{forced outage} or following a decrease in \textit{energy} withdrawal under sections 9.3.3 and/or 9.3.4 of Chapter 5; and

10.4.1.2 where the price so \textit{offered}, other than for additional quantities of \textit{energy}, \textit{reserve} or \textit{regulation}, is the same as that previously \textit{offered} for that \textit{dispatch period}. 
ENFORCEMENT

9. Based on the facts referred to above, the MSCP determined that TDT had breached section 10.4.1 of Chapter 6 of the Market Rules for period 24 on 15 January 2021.

10. The incident was self-reported and did not have a significant impact on the National Electricity Market of Singapore.

11. The MSCP hereby issues a letter of non-compliance to TDT and directs TDT to pay costs fixed at $2,000. The MSCP reminds TDT to observe the Market Rules and take appropriate corrective measures to prevent future recurrences.

T P B Menon
Chair, Market Surveillance and Compliance Panel