FACTS AND CIRCUMSTANCES


2. SNKCCP4 was undergoing an automatic voltage regulator test until 10:00 hrs (period 21) and was shut down at 10:22 hrs. Thereafter, SNKCCP4 was supposed to start up at 15:00 hrs (period 31).

3. Senoko Energy discovered that the test could not be completed in time. Hence, at 10:10 hrs, Senoko Energy decided to bring forward SNKCCP4’s start-up to 12:00 hrs (period 25) to provide additional six periods of test time for SNKCCP4 (periods 25 to 30).

4. At 10:20 hrs, SNKCCP4’s air purge premix valve alarm activated.

5. At 10:27 hrs, Senoko Energy’s trader was not aware of the alarm and submitted offer variations for period 25 to bring forward SNKCCP4’s start-up.

6. At 10:30 hrs (period 22), Senoko Energy’s operator discovered the alarm. At 10:50 hrs, Senoko Energy’s shift manager determined that SNKCCP4’s start-up should be cancelled to ensure safety and plant reliability since SNKCCP4 had just completed a major overhaul.

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1 Dispatch period 21 lasts from 10:00 hrs to 10:29 hrs.
2 Dispatch period 22 lasts from 10:30 hrs to 10:59 hrs.
7. At 10:54 hrs, Senoko Energy’s trader was informed to cancel SNKCCP4’s start-up. At 10:56 hrs, the trader submitted offer variations after gate closure to withdraw SNKCCP4 from the grid from period 25.

8. 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 a facility’s forced outage or failure to synchronise, given that SNKCCP4 encountered the alarm at period 21, the offer variation submitted after gate closure for period 25 was not in compliance with the Market Rules.

9. Senoko Energy explained that as the alarm was not expected, the incident was an unforeseen operational constraint and no possible remedial action would be taken.

10. On 29 March 2021, the 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 Market Rules for period 25 on 19 January 2021. The MSCP invited Senoko Energy to submit written representations by 12 April 2021 before the MSCP makes a determination.

11. On 12 April 2021, Senoko Energy submitted its written representations to the MSCP, providing the information below:

   a. Senoko Energy notes that section 10.4.1 of Chapter 6 of the Market Rules provides that 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, unless the offer submission falls within sections 10.4.1.1a to 10.4.1.1f of Chapter 6 of the Market Rules.

   b. Senoko Energy’s offer submission for SNKCCP4 falls under section 10.4.1.1b of Chapter 6 of the Market Rules, which allows Senoko Energy to submit an offer variation to reflect its revised capability for the three consecutive dispatch periods immediately following its failure to synchronise.

   c. SNKCCP4’s failure to synchronise should be deemed to have occurred at period 25, as the failure would only have occurred upon SNKCCP4’s dispatch at period 25. The provision in section 10.4.1.1b of Chapter 6 of the Market Rules would allow Senoko Energy to submit offer variations for SNKCCP4 for three consecutive dispatch periods following period 25, namely periods 26, 27 and 28.

   d. Therefore, Senoko Energy had submitted its offer variation well within the permitted time limit.

   e. Senoko Energy does not require a hearing.
APPLICABLE MARKET RULES

12. 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

13. 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 25 on 19 January 2021.
14. The incident was self-reported, it did not have a significant impact on the NEMS, and was brought about by an unforeseen issue with SNKCCP4.

15. Nevertheless, the incident could have been avoided if Senoko Energy had considered the time sensitivity required under the Market Rules when deciding on its actions upon detecting the alarm. Senoko Energy could also have taken remedial actions after the incident to avoid future reoccurrences.

16. The MSCP hereby imposes a financial penalty of $7,500 and directs Senoko Energy to pay costs fixed at $2,000.

T P B Menon
Chair, Market Surveillance and Compliance Panel