FACTS AND CIRCUMSTANCES

1. Enel X Singapore Pte. Ltd. (“Enel X Singapore”) submitted a self-report to the Market Surveillance and Compliance Panel (“MSCP”) on 29 April 2021 relating to its failure to maintain its reserve scheduled throughout the dispatch periods 17 to 19 on 20 April 2021.

2. On 20 April 2021, Enel X Singapore’s load registered facility (“LRF”) experienced a forced outage at 02:20 hrs (period 5) due to a power failure which led to an outage of both its compressors. The power failure was caused by an earth fault protection relay malfunction from the electrical substation (66kV).

3. Enel X Singapore was only notified by its customer of the forced outage at 07:39 hrs (period 16). Following which, Enel X Singapore proceeded to submit offer variations to remove its contingency reserve offers for period 20 onwards. As the contingency reserve offers were only removed for period 20 onwards, the LRF continued to be scheduled to provide contingency reserve for periods 17 to 19.

4. Enel X Singapore has identified the primary cause of this incident to be the failure of its internal compliance alerting platform, which is used to alert its real-time operators if any of its LRF’s instantaneous load drops below the offered quantity. Due to a glitch from the previous platform maintenance, the alert had a malfunction and did not trigger when the LRF experienced a forced outage. Enel X Singapore has since deployed and fixed the issue.

5. Enel X Singapore has also taken the following actions:
   a. reiterated to its customer the importance of notifying Enel X Singapore as soon as possible when there is a forced outage; and
b. revised the checklists related to the offer process that its operators would use during a forced outage situation and provided further training for all operators.

6. On 2 June 2021, the MSCP wrote to inform Enel X Singapore that it considered Enel X Singapore to be in *prima facie* breach of section 10.2.9 (a) of Chapter 10 of the System Operation Manual ("SOM") for periods 17 to 19 on 20 April 2021. The MSCP invited Enel X Singapore to submit written representations by 16 June 2021 before the MSCP makes a determination.

7. On 17 June 2021, Enel X Singapore submitted its written representations to the MSCP, reiterating a summary of the rule breach incident and the actions it had taken to address the issue and to prevent recurrence. Enel X Singapore also additionally provided a remedial action in its written representations, informing that it is in the process of implementing platform testing following platform maintenance to ensure proper functioning of the internal compliance alerting platform.

8. Enel X Singapore did not require a hearing.

**APPLICABLE RULES IN THE SYSTEM OPERATION MANUAL**

9. Section 10.2.9 of Chapter 10 of the SOM provides that

"10.2.9 Unable to provide reserve

[...]

A load registered facility is deemed unable to provide Reserve, if the load registered facility

a. fails to maintain its reserve scheduled throughout a dispatch period, or if there is a contingency event within the dispatch period fails to maintain its reserve scheduled from start of a dispatch period to start of the contingency event; or

b. fails to deliver its scheduled reserve within the required time frame and in accordance with the performance standards (as specified in the market rules) for each class of reserve; or

c. restores its interrupted load before PSO gives clearance."

**ENFORCEMENT**

10. Based on the facts referred to above, the MSCP determined that Enel X Singapore had breached section 10.2.9 (a) of Chapter 10 of the SOM for periods 17 to 19 on 20 April 2021.

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

12. The MSCP hereby issues a letter of non-compliance to Enel X Singapore and directs Enel X Singapore to pay costs fixed at $2,000.

T P B Menon
Chair, Market Surveillance and Compliance Panel