FACTS AND CIRCUMSTANCES


2. On 1 April 2021, Tuaspring scheduled a heat recovery steam generator safety valve Trevi test (“test”) to be carried out on TSPBLK1 from periods 18 to 35 on 6 April 2021.

3. Tuaspring would switch off the automatic generator control system during the test to keep the operating load and pressure in TSPBLK1 constant. Hence, TSPBLK1 would not be able to fulfil any scheduled reserves and regulation.

4. Given Tuaspring’s practice of revising its offers daily for the following day depending on market conditions, Tuaspring should have withdrawn its reserve and regulation offers for TSPBLK1 on 5 April 2021 to prepare for the test from periods 18 to 35 on 6 April 2021. However, Tuaspring did not do so as its trader had forgotten to consider the test when revising the offers on 5 April 2021 for 6 April 2021.

5. On 6 April 2021, at 8:28 hrs, after receiving a reminder from Tuaspring’s plant engineer, the trader submitted offer variations to withdraw the reserve and regulation offers for TSPBLK1 from the system from periods 19 to 35.

6. According to the Singapore Electricity Market Rules (“Market Rules”), no offer variation shall be submitted by a market participant within 65 minutes immediately prior to the dispatch period. In line with this, the offer variations submitted for TSPBLK1 for periods 19 and 20 on 6 April 2021 were not in compliance with the Market Rules.
7. Following the incident, Tuaspring took remedial actions by setting two calendar reminders for such scenarios in the future – three days before the test to confirm with the power plant that the test would be carried out and one day before the test to make the appropriate offer submissions.

8. On 30 June 2021, the MSCP wrote to inform Tuaspring that it considered Tuaspring to be in *prima facie* breach of section 10.4.1 of Chapter 6 of the Market Rules for periods 19 and 20 on 6 April 2021. The MSCP invited Tuaspring to submit written representations by 14 July 2021 before the MSCP makes a determination.

9. On 5 July 2021, Tuaspring submitted its written representations to the MSCP, providing the information below:

   a. On 6 April 2021, at 8:28 hrs, Tuaspring withdrew its reserve and regulation offers for TSPBLK1 from periods 19 to 35, even though the test was scheduled to be carried out on TSPBLK1 from periods 18 to 35. Tuaspring could no longer withdraw its offers for period 18 as those offers were already finalised.

   b. The test started at period 19 instead of the scheduled period 18 to avoid any potential failure to provide reserves at period 18. The test was completed successfully within the timeframe approved by the PSO (periods 18 to 35).

   c. As remedial actions to prevent future reoccurrences, Tuaspring would revise its offers to fit any future test requirement immediately on the day the test is decided, if permissible. Tuaspring’s traders would also discuss any upcoming test internally, as the trader on the day the test is decided might be different from the trader on the actual test day.

   d. Tuaspring does not require a hearing.

**APPLICABLE MARKET RULES**

10. 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

11. Based on the facts referred to above, the MSCP determined that Tuaspring had breached section 10.4.1 of Chapter 6 of the Market Rules for periods 19 and 20 on 6 April 2021.

12. The incident was self-reported and did not have a significant impact on the wholesale electricity market. Tuaspring also had taken remedial actions after the incident to avoid future reoccurrences.

13. Nevertheless, the incident was due to carelessness and could have been avoided if Tuaspring had exercised care in its offer submission. The MSCP reminds Tuaspring to be more cautious when carrying out its processes to prevent future reoccurrences.

14. The MSCP hereby issues a letter of non-compliance to Tuaspring and directs Tuaspring to pay costs fixed at $2,000.

T P B Menon
Chair, Market Surveillance and Compliance Panel