FACTS AND CIRCUMSTANCES


2. On 27 April 2021, TUASCCP4 was scheduled to synchronise at 13:30 hrs (period 28) for the annual black-start capability test. However, a diesel oil leak was found at the emergency diesel generator (“EDG”) 6 during its manual start up. The oil leak issue was rectified at 11:15 hrs (period 23) and was determined to have no major impact to the planned synchronisation of TUASCCP4 at period 28.

3. At 11:58 hrs (period 24), the duty trader received a call from the TPG station operator to delay the synchronisation of TUASCCP4 to period 29 instead to perform additional checks on all the EDG6 cylinders before starting the gas turbine.

4. As the duty trader was not available to execute the instruction immediately, TPG only submitted the offer variation for period 28 after gate closure at 12:46 hrs.

5. 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 the decision to delay the synchronisation was made by TPG at 11:58 hrs (period 24), any technical issues would have occurred before then. Accordingly, the offer variation submitted after gate closure for period 28 was not in compliance with the Market Rules.
6. On 30 June 2021, the MSCP wrote to inform TPG that it considered TPG to be in prima facie breach of section 10.4.1 of Chapter 6 of the Market Rules for period 28 on 27 April 2021. The MSCP invited TPG to submit written representations by 14 July 2021 before the MSCP makes a determination.

7. On 16 July 2021, TPG submitted its written representations to the MSCP. TPG reiterated the sequence of events. TPG also additionally informed that it had promptly followed up with a self-report after the incident and that the incident did not result in system instability or major financial impact.

8. TPG does not require a hearing.

**APPLICABLE MARKET RULES**

9. 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

10. Based on the facts referred to above, the MSCP determined that TPG had breached 
section 10.4.1 of Chapter 6 of the Market Rules for period 28 on 27 April 2021.

11. The incident was self-reported and did not have a significant impact on the National 
Electricity Market of Singapore. Nonetheless, the incident could have been avoided if TPG 
was able to execute the instruction to submit the offer variation without delay.

12. The MSCP hereby imposes a financial penalty of $3,500 and directs TPG to pay costs 
fixed at $2,000.


T P B Menon
Chair, Market Surveillance and Compliance Panel