FACTS AND CIRCUMSTANCES


2. On 15 June 2021, SERCCP1 was carrying out recommissioning of the gas turbine combustion tuning and the heat recovery steam generator safety valve testing, as part of its commissioning activities after a major outage.

3. At 15:30 hrs (period 32), the site commissioning engineers from the original equipment manufacturer (“OEM”) discovered an issue with the gas turbine combustion. After monitoring the issue, they approached the combustion department in Germany at 15:45 hrs (period 32) for help.

4. At 16:04 hrs (period 33), the OEM site team informed YTLPS that SERCCP1 was required to maintain its load for stabilisation. YTLPS submitted the relevant offer variations after gate closure for periods 35 and 36 at 16:33 hrs (period 34).

5. 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 the technical incident related to the combustion issue occurred at period 32, the offer variation submitted after gate closure for period 36 was not in compliance with the Market Rules.

6. On 7 October 2021, the MSCP wrote to inform YTLPS that it considered YTLPS to be in prima facie breach of section 10.4.1 of Chapter 6 of the Market Rules for period 36 on 15
June 2021. The MSCP invited YTLPS to submit written representations by 21 October 2021 before the MSCP makes a determination.

7. On 21 October 2021, YTLPS submitted its written representations to the MSCP. The points related to the 15 June 2021 incident as submitted in YTLPS’ written representations are summarised below:

   a. YTLPS requested the MSCP to review its determination that the incident in question should be the OEM’s team analysis indicating to maintain the load, which was provided to YTLPS at 16:04 hrs (period 33), instead of the technical incident related to the combustion issue at 15:30 hrs (period 32).

   b. It was only in period 33 that a decision was made to maintain the generation load level.

8. Additionally, YTLPS appealed MSCP to revisit the assessment from the angle of the purpose of section 10.4.1.1b of Chapter 6 of the Market Rules. YTLPS also hoped the MSCP could take into consideration that its responsible offer behaviour ensures the Market Clearing Engine is taking in the right generation capability for SERCCP1 for the system dispatch.

9. YTLPS did 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 YTLPS had breached section 10.4.1 of Chapter 6 of the Market Rules for period 36 on 15 June 2021.

12. 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 the time sensitivity required under the Market Rules was adequately considered by YTLPS when managing the combustion issue with its OEM.

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

T P B Menon  
Chair, Market Surveillance and Compliance Panel