

## **REPLY TO PUBLIC COMMENTS ON PROPOSED CATALOGUE OF DATA**

Public comments were invited on a proposed catalogue of data on 7 March 2003. The Market Surveillance and Compliance Panel ("MSCP") thanks all parties who provided comments. Each comment has received careful attention and the response of the MSCP is set out in this paper. Modifications have also been made to the proposed catalogue of data where appropriate. New areas introduced to the proposed catalogue are highlighted to market participants, the market support services licensee, the PSO, the EMC and other interested parties and they are invited to provide comments on these new areas to the MSCP by **20 June 2003** at the following address:

Market Surveillance and Compliance Panel  
c/o Market Assessment Unit  
9 Raffles Place #22-01  
Republic Plaza  
Singapore 048619  
Fax: 6533 0340  
Email: mau@emcsg.com

**9 June 2003**

## **INTRODUCTION**

A proposed catalogue of data was first introduced to the market at a Data Catalogue Consultation Forum on 7 March 2003. Market participants, service providers and all interested parties were invited to provide comments on the proposed catalogue of data to the Market Surveillance and Compliance Panel (“MSCP”) by 20 March 2003.

The MSCP received responses from a number of market participants and service providers and would like to thank all market participants and service providers for their very useful comments.

## **PUBLIC COMMENTS**

Most of the comments centred around concerns over providing certain items of data for the following reasons:

- (a) The data is not relevant to the MSCP’s monitoring objectives.
- (b) The data has already been furnished to the Energy Market Authority (“EMA”) or Power System Operator (“PSO”) and should be obtained from the EMA or PSO.
- (c) The data can be derived from available data.
- (d) The data is confidential or commercially sensitive.

It has also been brought to our attention that there is some concern that our role may overlap with the role of the EMA.

We would like to assure all parties who have given their comments that each comment has received careful attention. We have spent some time considering what is the role of the MSCP and what are our monitoring objectives. This subject has also been discussed extensively with the Energy Market Company Pte Ltd and the Energy Market Authority. The exercise was valuable in clarifying the scope of our work in the days ahead and helped us evaluate what data needed to be collected.

## **ROLE OF THE MSCP**

It would be useful at this stage to set out the role of the MSCP as referred to in the Singapore Electricity Market Rules (the “market rules”).

One of the statutory objectives under the Electricity Act is to achieve economic efficiency in the Singapore electricity industry. The MSCP supports the achievement of this statutory objective by performing the following role:

## Reply by MSCP to Public Comments

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### (a) Rule Compliance

- monitors and analyses market conduct and activities for rule breaches in the wholesale electricity market
- investigates rule breaches
- takes enforcement action
- reports to the EMC, PSO and EMA where necessary

### (b) Efficiency, Fairness and Competitiveness

- monitors and analyses market conduct and activities to assess whether the underlying structure of the wholesale electricity market is consistent with the efficient and fair operation of a competitive market
- investigates inefficiencies
- recommends remedial action
- reports to the EMC, PSO and EMA where necessary

### (c) Annual Report

- submits an annual report to the EMC and EMA on the state of competition and compliance within, and the efficiency of the wholesale electricity market.

## RESPONSE TO PUBLIC COMMENTS

With the above background, we set out the items in the proposed catalogue of data that we have received comments on, a summary of the comments received and our response to each of these comments.

Data Catalogue	Summary of Public Comments	MSCP/MAU Response
Item 10 Fuel type of each generation registered facility	<u>Data provided to EMA/PSO</u> The data has been provided to EMA/PSO. It should be obtained from EMA/PSO.  <u>Confidentiality</u> The data is confidential.	<u>Data provided to EMA/PSO</u> PSO advised that they do not have the information ie they are not informed when there is a change of the fuel type.  <u>Confidentiality</u> The information will be strictly for the use of the MSCP/MAU and will be treated as confidential information.

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<b>Data Catalogue</b>	<b>Summary of Public Comments</b>	<b>MSCP/MAU Response</b>
<p>Item 11: Heat rate of each generation registered facility</p>	<p><u>Relevance to monitoring objectives</u> The data is not relevant to the monitoring objectives of the MSCP.</p> <p><u>Data provided to EMA/PSO</u> The data has been provided to EMA/PSO. It should be obtained from EMA/PSO.</p> <p><u>Confidentiality</u> The data is commercially sensitive or confidential.</p>	<p><u>Relevance to monitoring objectives</u> The market rules provide for the MSCP to assess if the underlying structure of the wholesale electricity market is consistent with the efficient and fair operation of a competitive market. The heat rate would be relevant in making such an assessment.</p> <p><u>Data provided to EMA/PSO</u> The EMA has proposed that the data be obtained directly from generation licensees.</p> <p><u>Confidentiality</u> The information will be strictly for the use of the MSCP/MAU and will be treated as confidential information.</p>
<p>Items 12 – 15: 12) Year the generation registered facility was first commissioned 13) Total annual forced outage hours (past three years) of each generation registered facility 14) Total annual planned outage hours (past three years) of each generation registered facility 15) Total annual overhaul hours (past three years) of each generation registered facility</p>	<p><u>Data provided to EMA/PSO</u> The data has been provided to EMA/PSO. It should be obtained from EMA/PSO.</p> <p><u>Confidentiality</u> The data is confidential.</p>	<p><u>Data provided to EMA/PSO</u> PSO advised that they do not have the information.</p> <p><u>Confidentiality</u> The information will be strictly for the use of the MSCP/MAU and will be treated as confidential information.</p>

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<b>Data Catalogue</b>	<b>Summary of Public Comments</b>	<b>MSCP/MAU Response</b>
<p>Item 16: Availability factor of each generation registered facility ie the percentage of time a generation registered facility is available to generate electricity in a year (past three years)</p>	<p><u>Data provided to EMA/PSO</u> The data has been provided to EMA/PSO. It should be obtained from EMA/PSO.</p> <p><u>Data can be derived</u> The data can be derived from generator bids received by EMC.</p> <p><u>Confidentiality</u> The data is commercially sensitive or confidential.</p>	<p><u>Data provided to EMA/PSO</u> PSO advised that they do not have the information. <u>Data can be derived</u> This is a request for historical data (ie for past three years)</p> <p>As a 0 quantity may sometimes be offered in respect of a generation registered facility even when it is not on outage, it may not always be possible to derive the availability factor from bids received by EMC.</p> <p><u>Confidentiality</u> The information will be strictly for the use of the MSCP/MAU and will be treated as confidential information.</p>
<p>Item 17: Maps and diagrams of the transmission system showing: - ratings of transmission lines - import links from Malaysia - location of each generation registered facility</p>	<p><u>Confidentiality</u> The information may be released to other market participants and this may compromise national security.</p> <p><u>Information may be obtained from PSO</u> The data has been provided to PSO. It should be obtained from PSO.</p>	<p><u>Modification of Catalogue of Data</u> PSO has no objections to providing such information to MSCP/MAU on a confidential basis. We have therefore modified the catalogue of data to indicate that this information will be collected from PSO. The information will be strictly for the use of the MSCP/MAU and will be treated as confidential information.</p>
<p>Item 27: Annual overhaul duration of each generation registered facility in hours</p>	<p><u>Data provided to EMA/PSO</u> The data has been provided to EMA/PSO. It should be obtained from EMA/PSO.</p>	<p><u>Data provided to EMA/PSO</u> In the catalogue of data, we had proposed obtaining the data from the PSO and not market participants. PSO has no objection to providing the data to the MSCP/MAU.</p>

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<b>Data Catalogue</b>	<b>Summary of Public Comments</b>	<b>MSCP/MAU Response</b>
<p><u>Item 28:</u> Total generation capacity under maintenance (planned outages and annual overhaul)</p>	<p><u>Data provided to EMA/PSO</u> The data has been provided to EMA/PSO. It should be obtained from EMA/PSO.</p>	<p><u>Data provided to EMA/PSO</u> In the catalogue of data, we had proposed obtaining the data from the PSO and not market participants. PSO has no objection to providing the data to the MSCP/MAU.</p>
<p><u>Item 29:</u> Short-term planned outage by generation registered facility</p>	<p><u>Data provided to EMA/PSO</u> The data has been provided to EMA/PSO. It should be obtained from EMA/PSO.</p>	<p><u>Data provided to EMA/PSO</u> In the catalogue of data, we had proposed obtaining the data from the PSO and not market participants. PSO has no objection to providing the data to the MSCP/MAU.</p>
<p><u>Item 30:</u> Forced outage by generation registered facility</p>	<p><u>Data provided to EMA/PSO</u> The data has been provided to EMA/PSO. It should be obtained from EMA/PSO.</p>	<p><u>Data provided to EMA/PSO</u> In the catalogue of data, we had proposed obtaining the data from the PSO and not market participants. PSO has no objection to providing the data to the MSCP/MAU.</p>
<p><u>Item 36:</u> Cost of generation of electricity for each generation registered facility in \$/MWh i.e. (a) Fuel cost (b) Total Variable Costs (i.e. fuel costs plus other variable costs) (c) Total Costs (i.e. total variable costs plus fixed costs)</p>	<p><u>Relevance to monitoring objectives</u> The data is not relevant to the monitoring objectives of the MSCP.</p> <p><u>Confidentiality</u> The data is commercially sensitive or confidential.</p>	<p><u>Modification of Catalogue of Data</u> The market rules provide for the MSCP to assess if the underlying structure of the wholesale electricity market is consistent with the efficient and fair operation of a competitive market. The cost of generation of electricity would be relevant in making such an assessment. However, the MSCP has noted the concerns expressed by market participants and decided to modify the catalogue of data to exclude this item.</p>

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<b>Data Catalogue</b>	<b>Summary of Public Comments</b>	<b>MSCP/MAU Response</b>
Item 53: Vesting contracts information	<p><u>Relevance to monitoring objectives</u> The data is not relevant to the monitoring objectives of the MSCP.</p> <p><u>Confidentiality</u> The data is commercially sensitive or confidential.</p>	<p><u>Relevance to monitoring objectives</u> The market rules provide for the MSCP to assess if the underlying structure of the wholesale electricity market is consistent with the efficient and fair operation of a competitive market. Vesting contracts may affect market behaviour and would be relevant in making such an assessment.</p> <p>In the catalogue of data, we had proposed obtaining this data from the MSSL and not market participants. The MSSL has not objected to providing such information.</p>
Item 54: Bilateral contracts information	<p><u>Relevance to monitoring objectives</u> The data is not relevant to the monitoring objectives of the MSCP.</p> <p><u>Confidentiality</u> The data is commercially sensitive or confidential.</p>	<p><u>Modification of Catalogue of Data</u> The MSCP has noted the comments of market participants and decided to modify the catalogue of data to exclude this item.</p>
Confidentiality	<p><u>Identification of confidential information</u> Requests for identification of the items in the catalogue of data which will be considered confidential.</p>	<p><u>Identification of confidential information</u> We have identified in the catalogue of data those items we consider to be confidential information. Such information will not be provided to other market players pursuant to section 4.3.8 of Chapter 3 of the market rules.</p>

**OTHER MATTERS**

Current availability factor

In the proposed catalogue of data, the current availability factor was not specifically requested. We are now proposing that this item also be included. This is because the PSO and the EMC do not currently have data as to when a forced outage ends. It is therefore not possible for the availability factor to be derived. We are proposing that market participants provide the availability factor on a monthly basis.

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### Copies of licenses issued under the Electricity Act

As copies of the licenses are now available on the EMA website, the MSCP has decided to exclude this item from the proposed catalogue of data.

### **PROPOSED CATALOGUE OF DATA**

We have accordingly modified the proposed catalogue of data as indicated in our above responses to public comments. The updated version of the proposed catalogue of data is attached as Attachment 1.

### **INVITATION TO PROVIDE COMMENTS ON NEW AREAS**

The following areas of the proposed catalogue of data are new:

1. inclusion of the availability factor in the proposed catalogue of data (as item 36);
2. identification of items in the proposed catalogue of data which are considered confidential information.

Given the above new areas, we would like to invite market participants, the market support services licensee, the PSO, the EMC and other interested parties to let us have views, if any, on these areas.

Please direct your comments to the MSCP by 20 **June 2003** at the following address:

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**Lim Chin**  
**Panel Member**  
**on behalf of**  
**Chair, Market Surveillance and Compliance Panel**

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