



INDEPENDENT
MARKET
OPERATOR

Final Rule Change Report

Correction to Estimated Output of Intermittent Generation for the Purposes of Appendix 9

RC_2013_17

Standard Rule Change Process

Date: 24 April 2014

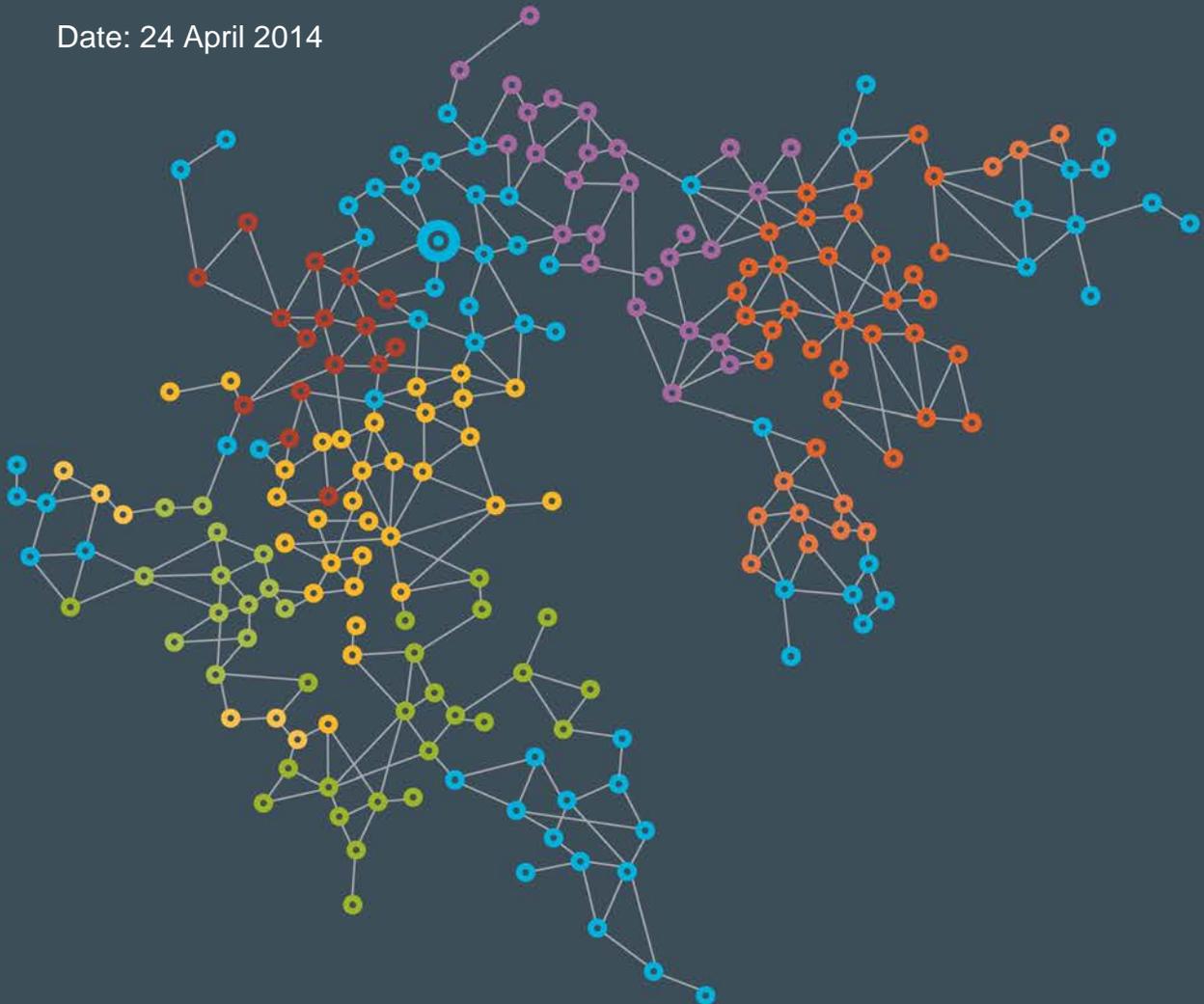


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Executive Summary

The level of Certified Reserve Capacity assigned to Intermittent Generation is currently determined in accordance with the Relevant Level Methodology specified in Appendix 9 of the Wholesale Electricity Market Rules (Market Rules). The methodology utilises the output of a candidate Facility in peak Load for Scheduled Generation Trading Intervals, selected from years prior to the certification period.

Where an Intermittent Generator receives a downward Dispatch Instruction from System Management, the amount of electricity sent out by the Facility will be lower than would have been the case in the absence of the Dispatch Instruction. When such a Dispatch Instruction is received an estimate of the output that could have otherwise been achieved by the Facility is provided to the IMO by System Management. This estimate for a peak Load for Scheduled Generation Trading Interval is used by the IMO in setting the Facility's Relevant Level for the purposes of certification to ensure that the Facility is not inappropriately penalised in the determination of its Relevant Level.

Neither the Market Rules nor the Power System Operation Procedure (PSOP): Dispatch currently contemplate the possibility that these estimates may require updating to provide an estimate that better reflects the potential output of the Facility, for example where the quantity actually generated is higher than the estimate initially provided by System Management. As the intention of certification is to reflect the ability of an Intermittent Generator to produce during peak periods, it is appropriate that, where an estimate is unreasonable, the IMO should be able to take into account a revised estimate or the actual generated quantity.

Proposed Amendments

Alinta Energy proposed to amend Appendix 9 of the Market Rules and introduce new clauses in section 7.7 of the Market Rules to enable revisions to estimates where a Dispatch Instruction is issued by System Management and to allow the IMO to take these revised estimates into account in the Relevant Level Methodology for the purposes of certification. However, Alinta Energy's proposal was not clear with respect to how the proposed revised estimates will be determined.

In the Draft Rule Change Report the IMO proposed an alternative drafting approach that sought to clarify the obligations of the IMO, System Management and Market Participants in determining an appropriate Relevant Level for a Facility. The IMO proposed amendments to clauses 7.7.5A, 7.7.5B and steps 4 and 9 of Appendix 9 of the Market Rules and to introduce a new step 9A of Appendix 9. The IMO also proposed minor amendments to ensure that the clause 6.15.2 of the Market Rules was drafted consistently with the associated clauses in section 7.7.

Consultation

The Market Advisory Committee (MAC) discussed the pre Rule Change Proposal at the 13 November 2013 MAC meeting. At the meeting, MAC members agreed that the proposal should be submitted into the formal rule change process. Alinta Energy formally submitted the proposal into the Standard Rule Change Process on 22 November 2013. The IMO published the Rule Change Notice and Proposal on 28 November 2013.

The first submission period was held between 29 November 2013 and 14 January 2014. Submissions were received from Community Electricity, Perth Energy and System Management. All three submissions supported the principle underpinning the Rule Change Proposal. However,

System Management noted its concerns with the proposed drafting of the Amending Rules on the basis that it believed that the Market Rules already provided for the revision of this estimate.

The second submission period was held between 25 February and 25 March 2014. During the second submission period, one submission was received from System Management. System Management continued to support the principle underlying the proposed changes. However, System Management requested the IMO to introduce a new clause in the Market Rules to make it explicit that a Market Participant may request a revision of an estimate made under clause 7.13.1(eF) of the Market Rules for the purposes of determining a Facility's Relevant Level.

Assessment Against the Wholesale Market Objectives

The IMO considers that the proposed amendments will better achieve Wholesale Market Objectives (a), (c) and (d). The IMO considers that the proposal is consistent with the remaining Wholesale Market Objectives.

Practicality and Cost of Implementation

The IMO considers that System Management will incur minor operational costs to revise its estimates for Intermittent Generators where applicable. System Management noted that there may be minor costs associated with the retrieval of some data used in a revision.

In its submission, System Management also noted that changes to PSOP: Dispatch would be required to outline the process under which a revision will be undertaken and used in the certification process. System Management indicated that the PSOP changes would not be completed until 1 October 2014. This will not allow the procedure changes to be in place for the 2014 Reserve Capacity Cycle which opens on 1 May 2014. However, the IMO considers that the changes are not significant and will not impede the implementation of the proposed Amending Rules by 1 May 2014.

As the process for calculating a Facility's Relevant Level is detailed in Appendix 9 of the Market Rules, the IMO considers that Market Procedure changes are not required. However, the IMO expects to incur minor operational costs associated with updates to models and the associated internal procedures used in the certification of Reserve Capacity to allow for the consideration of the revised estimates or the use of actual meter data where applicable.

The IMO also notes that System Management expected the Market Procedure: IMS Interface to be amended as a result of this Rule Change Proposal. However, the IMO considers that the cost of systemising the provision of this data will far outweigh the benefits. The IMO receives the original estimate provided under clause 7.13.1(eF) of the Market Rules for the purpose of settlement. This number is not able to be altered under clause 6.15.4 of the Market Rules. If the provision of a revised estimate for the purposes of determining a Facility's Relevant Level is systemised, significant costs would be incurred to develop, test and certify any changes to the settlement system. The IMO therefore proposes to work with System Management to agree to changes to the current manual method of data transfer in the circumstances where an estimate or revision is provided for the purposes of certification.

The IMO's Decision

The IMO's decision is to accept the Rule Change Proposal as modified following the first submission period.

Next Steps

The Amending Rules are proposed to commence at **8:00 AM** on **1 May 2014**.

1. Rule Change Process and Timetable

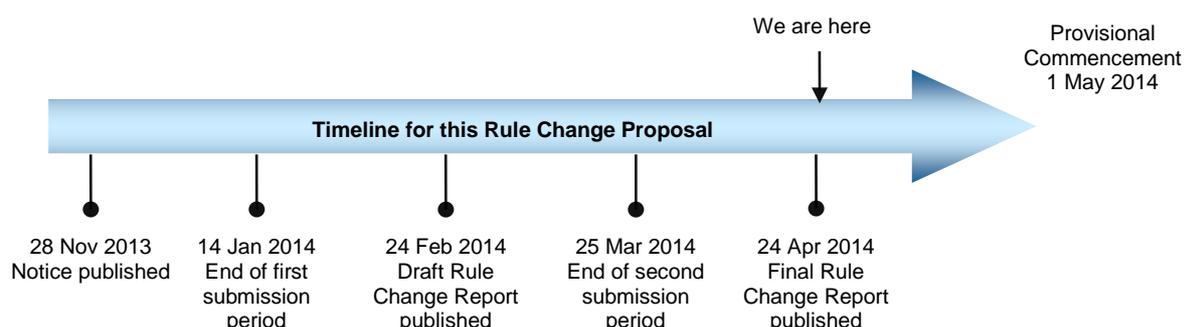
On 22 November 2013, Alinta Energy submitted a Rule Change Proposal regarding the introduction of new clauses 7.7.5E, 7.7.5F, 7.7.5G and 7.7.5H and amendments to Appendix 9 of the Wholesale Electricity Market Rules (Market Rules).

In the Draft Rule Change Report, the IMO took a different drafting approach to improve the overall clarity of the process for revisions of estimates provided by System Management and used by the IMO for the purposes of certification. In the Draft Rule Change Report the IMO proposed amendments to clauses 6.15.2, 7.7.5A, 7.7.5B and Appendix 9 of the Market Rules.

This proposal is being processed using the Standard Rule Change Process, described in section 2.7 of the Market Rules.

In accordance with clause 2.5.10 of the Market Rules, the IMO decided to extend the timeframe for the publication of the Draft Rule Change Report as outlined in the notice of extension published on 12 February 2014 to allow the IMO to consult further with System Management on the required Power System Operation Procedure (PSOP) changes. The IMO published the Draft Rule Change Report on 24 February 2014.

The key dates in processing this Rule Change Proposal are:



2. Proposed Amendments

2.1. The Rule Change Proposal

Alinta Energy proposed to amend Appendix 9 of the Market Rules and introduce new clauses in section 7.7 of the Market Rules to enable revisions to the estimated output of an Intermittent Generator where a Dispatch Instruction is issued by System Management directing the Facility to reduce its output, and to allow the IMO to take these revised estimates into account in the Relevant Level Methodology for the purposes of certification¹. However, Alinta Energy's proposal was not clear with respect to how the proposed revised estimate will be determined.

In the Draft Rule Change Report the IMO proposed an alternative drafting approach that sought to

¹ It should be noted that Alinta Energy's proposed amendments contain the ability for the IMO to use revised estimates for the purposes of the Relevant Level Methodology calculations and do not consider its application for the purposes of the Minimum Theoretical Energy Schedule calculation under clause 6.15.2(b) or settlements under Chapter 9 of the Market Rules.

clarify the obligations of the IMO, System Management and Market Participants in determining an appropriate Relevant Level for a Facility. The IMO proposed amendments to clauses 7.7.5A, 7.7.5B and steps 4 and 9 of Appendix 9 and to introduce a new step 9A of Appendix 9 of the Market Rules. The IMO also proposed minor amendments to ensure that the clause 6.15.2 of the Market Rules was drafted consistently with the associated clauses in section 7.7.

The IMO considers that the Amending Rules as proposed in the Draft Rule Change Report ensure that the Market Rules remain principles based and the more prescriptive details are kept to the calculations in Appendix 9 and the relevant PSOP.

For full details of the Rule Change Proposal please refer to the Market Web Site: http://www.imowa.com.au/RC_2013_17.

2.2. The IMO's Initial Assessment of the Rule Change Proposal

The IMO decided to proceed with the proposal on the basis that Rule Participants should be given an opportunity to provide submissions on the Rule Change Proposal.

2.3. Protected Provisions, Reviewable Decisions and Civil Penalties

The proposed Amending Rules do not affect any Protected Provisions, Reviewable Decisions or civil penalties.

The IMO considers that the new clauses proposed in this Rule Change Proposal do not require any new Protected Provisions, Reviewable Decisions or civil penalties to be established on the basis that similar clauses in the Market Rules currently do not.

3. Consultation

3.1. The Market Advisory Committee

The Market Advisory Committee (MAC) discussed the pre Rule Change Proposal at the 13 November 2013 MAC meeting. At this meeting MAC members discussed different options for undertaking the revision, including the IMO undertaking revisions and System Management routinely reassessing estimates to remove the obligation for Market Participants to request the revision. However, no alternatives were considered an enhancement on Alinta Energy's proposed approach.

At the meeting, MAC members agreed that the proposal should be submitted into the formal rule change process. Alinta Energy formally submitted the proposal into the Standard Rule Change Process on 22 November 2013. The IMO published the Rule Change Notice and Proposal to 28 November 2013.

Further details are available in the MAC meeting minutes available on the Market Web Site: <http://www.imowa.com.au/MAC>.

3.2. Submissions Received During the First Submission Period

The first submission period was held between 29 November 2013 and 14 January 2014. Submissions were received from Community Electricity, Perth Energy and System Management.

All three submissions supported the principle underpinning the Rule Change Proposal.

System Management noted its concerns with the proposed drafting of the Amending Rules on the basis that it believed that the Market Rules already provide for the revision of the estimates and use of revised estimates in the certification process.

Perth Energy noted that more recent and accurate data should also be used for other purposes including settlement.

Perth Energy and System Management also suggested some improvements to the proposed drafting of the Amending Rules.

A copy of all submissions in full received during the first submission period is available on the Market Web Site: http://www.imowa.com.au/RC_2013_17.

3.3. The IMO's Response to Submissions Received During the First Submission Period

The IMO's response to submissions received during the first submission period are detailed in section 4.3 of the Draft Rule Change Report available on the Market Web Site: http://www.imowa.com.au/RC_2013_17.

3.4. Submissions Received During the Second Submission Period

The second submission period was held between 25 February and 25 March 2014. During the second submission period, one submission was received from System Management. System Management restated its support for the principle underlying the proposed changes and considered that the proposed amendments will better address the Wholesale Market Objectives.

In its submission, System Management requested the IMO to introduce a new clause in the Market Rules to make it explicit that a Market Participant may request a revision of an estimate made under clause 7.13.1(eF) for the purposes of determining a Facility's Relevant Level.

A copy of all submissions in full received during the second submission period is available on the Market Web Site: http://www.imowa.com.au/RC_2013_17.

3.5. The IMO's Response to Submissions Received During the Second Submission Period

The IMO acknowledges that it may be desirable to include an explicit clause stating that a Market Participant is able to request the revision of an estimate made under clause 7.13.1(eF) of the Market Rules for the purposes of determining a Facility's Relevant Level. However, the IMO has not incorporated this change because:

1. the current structure of the Market Rules does not provide a logical position for such a clause on the basis that the revision can only be used for the purposes of the certification of Reserve Capacity; and
2. the proposed amendments to clause 7.7.5A and steps 4 and 9A of Appendix 9 of the Market Rules provide a sufficient head of power for System Management to undertake revisions in accordance with the approved PSOP.

3.6. Public Forums and Workshops

No public forums or workshops were held with regard to this Rule Change Proposal.

4. The IMO's Draft Assessment

The IMO's draft assessment, against clauses 2.4.2 and 2.4.3 of the Market Rules, and analysis of the Rule Change Proposal can be viewed in the Draft Rule Change Report, available on the Market Web Site: http://www.imowa.com.au/RC_2013_17.

5. The IMO's Proposed Decision

The IMO's proposed decision was to accept the Rule Change Proposal as modified following the first submission period.

The wording of the relevant proposed Amending Rules was presented in section 7 of the Draft Rule Change Report available on the Market Web Site: http://www.imowa.com.au/RC_2013_17.

The IMO made its proposed decision on the basis that the proposed Amending Rules:

- will better achieve Wholesale Market Objectives (a), (c) and (d);
- are consistent with the remaining Wholesale Market Objectives;
- have the support of MAC members; and
- received in-principle support in all submissions received during the first submission period.

6. The IMO's Final Assessment

In preparing its Final Rule Change Report, the IMO must assess the Rule Change Proposal in light of clauses 2.4.2 and 2.4.3 of the Market Rules.

Clause 2.4.2 of the Market Rules outlines that the IMO "must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be amended or replaced, are consistent with the Wholesale Market Objectives". Additionally, clause 2.4.3 of the Market Rules states, when deciding whether to make Amending Rules, the IMO must have regard to the following:

- any applicable policy direction from the Minister regarding the development of the market;
- the practicality and cost of implementing the proposal;
- the views expressed in submissions and by the MAC; and
- any technical studies that the IMO considers necessary to assist in assessing the Rule Change Proposal.

The IMO notes that there has not been any applicable policy direction from the Minister in respect of this Rule Change nor has it commissioned a technical review in respect of this Rule Change

Proposal. A summary of the views expressed in submissions and by the MAC is available in section 3 of this Final Rule Change Report.

The IMO's assessment of the Rule Change Proposal, inclusive of the further amendments made following the first submission period, is outlined in the following sub-sections.

6.1. Additional Amendments to the Amending Rules

The IMO has made no additional amendments to the proposed Amending Rules.

6.2. Assessment Against the Wholesale Market Objectives

The IMO considers that the Market Rules as a whole, if amended as presented in section 8.2, will not only be consistent with the Wholesale Market Objectives but also allow the Market Rules to better achieve Wholesale Market Objectives (a), (c) and (d).

The IMO's assessment is presented below:

- (a) *to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system*

The IMO considers that the proposed amendments allow estimates to better reflect the potential output of an Intermittent Generator for the purposes of the certification of Reserve Capacity. This promotes overall economic efficiency by ensuring that the IMO does not unnecessarily procure additional capacity in the event of a 'false' shortfall in capacity resulting from lower estimates of an Intermittent Generator's capacity than what is achievable.

- (c) *to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions*

The ability for Rule Participants to request a revision of System Management's estimate of the output of an Intermittent Generator where it is dispatched downwards will ensure that the IMO is able to use the estimate most reflective of its potential output for the purposes of the certification of Reserve Capacity. This will ensure that Intermittent Generators are not unduly penalised where the estimate is used to determine its Certified Reserve Capacity under the Relevant Level Methodology in Appendix 9 of the Market Rules. It should be noted that Scheduled Generators do not bear the same risk with respect to certification as a result of such Dispatch Instructions.

The proposed amendments will ensure that Intermittent Generators are fairly compensated under the Reserve Capacity Mechanism.

- (d) *to minimise the long-term cost of electricity supplied to customers from the South West interconnected system*

The proposed amendments will ensure that the long-term cost of electricity supplied is minimised by avoiding higher costs associated with procuring capacity in the event of a 'false' shortfall in capacity and by ensuring equitable compensation for Intermittent Generators.

The IMO considers that the proposed changes are consistent with the remaining Wholesale Market Objectives.

6.3. Practicality and Cost of Implementation

6.3.1. Cost

The IMO noted that System Management will incur minor operational costs to revise its estimates for Intermittent Generators where applicable. System Management noted that there may be minor costs associated with the retrieval of some data used in a revision.

The IMO expects to incur minor operational costs associated with updates to models and the associated internal procedures used in the certification of Reserve Capacity to allow for the consideration of the revised estimates or the use of actual meter data where applicable.

6.3.2. Practicality

The IMO does not consider that there are any issues with the practicality of implementation of the proposed changes prior to the proposed commencement of the Amending Rules.

System Management noted that the amendments to PSOP: Dispatch will not be completed until 1 October 2014. However, the IMO considers that the delay in the changes to the PSOP will not impede the implementation of the proposed Amending Rules by 1 May 2014.

No other issues were identified with the practicality of implementation of the proposed changes through the consultation process.

6.3.3. Amendments to Associated Market Procedures

As noted previously, amendments to the PSOP: Dispatch are required to fully implement this Rule Change Proposal. As the process for calculating a Facility's Relevant Level is detailed in Appendix 9 of the Market Rules, Market Procedure changes are not required for the purposes of certification of Reserve Capacity.

The IMO also notes that System Management expected the Market Procedure: IMS Interface to be amended as a result of this Rule Change Proposal. However, the IMO considers that the cost of systemising the provision of this data will far outweigh the benefits. The IMO receives the original estimate provided under clause 7.13.1(eF) of the Market Rules for the purpose of settlement. This number is not able to be altered under clause 6.15.4 of the Market Rules. If the provision of a revised estimate for the purposes of determining a Facility's Relevant Level is systemised, significant costs would be incurred to develop, test and certify any changes to the settlement system. The IMO therefore proposes to work with System Management to develop changes to the current manual method of data transfer in the circumstances where an estimate or revision is provided for the purposes of certification.

7. The IMO's Decision

Based on the matters set out in this report, the IMO's decision is to accept the Rule Change Proposal as modified following the first submission period.

7.1. Reasons for the Decision

The IMO made its proposed decision on the basis that the Amending Rules:

- will better achieve Wholesale Market Objectives (a), (c) and (d);
- are consistent with the remaining Wholesale Market Objectives;
- have the general support of MAC members; and
- received in-principle support of all submissions received during the first and second submission periods.

Additional detail outlining the analysis behind the IMO decision is outlined in section 6 of this Final Rule Change Report.

8. Amending Rules

8.1. Commencement

The Amending Rules are proposed to commence at **8:00 AM** on **1 May 2014**.

8.2. Amending Rules

The IMO has decided to implement the following Amending Rules (~~deleted text~~, added text):

6.15.2_ The Minimum Theoretical Energy Schedule in a Trading Interval equals:

...

(b) for a Balancing Facility which is a Non-Scheduled Generator:

- i. if a Dispatch Instruction was issued to the Balancing Facility to decrease its output and the Loss Factor Adjusted Price of the Balancing Price-Quantity Pair in respect of the Balancing Facility is less than the Balancing Price, then System Management's estimate of the maximum amount of sent out energy, in MWh, which the Balancing Facility would have ~~supplied~~ generated in the Trading Interval had the Dispatch Instruction not been issued; and

...

...

~~7.7.5A. System Management must develop, in a Power System Operation Procedure, the information that must be provided by a Market Participant to System Management for each of the Market Participant's Non-Scheduled Generators for each Trading Interval to enable an estimation of the output of each Facility, in MWh, to be undertaken by:~~

- ~~(a) System Management, as required under clauses 6.15.2(b)(i), 7.7.5B and 7.13.1C(e); and~~
- ~~(b) the IMO, as required by the Relevant Level Methodology.~~

7.7.5A. System Management must develop a Power System Operation Procedure specifying:

- (a) information that a Market Participant must provide to System Management, for each of the Market Participant's Non-Scheduled Generators, and for each Trading Interval, for the purposes of:
 - i. the estimate referred to in clause 7.7.5A(b);
 - ii. the revised estimate referred to in clause 7.7.5A(c); or
 - iii. step 6 of Appendix 9.
- (b) for the purposes of clause 7.7.5B and the Relevant Level Methodology – one or more methods that may be used to estimate the maximum quantity of sent out energy (in MWh) that a Non-Scheduled Generator would have generated in a Trading Interval had a Dispatch Instruction not been issued for that Facility and for that Trading Interval;
- (c) for the purposes of the Relevant Level Methodology only – the process for revising an estimate that was made strictly in accordance with one of the methods that, under clause 7.7.5A(b), must be specified in the Power System Operation Procedure; and
- (d) for the purposes of clause 7.13.1C(e) – one or more methods that may be used to estimate the decrease in the output (in MWh) of each of Synergy's Non-Scheduled Generators as a result of an instruction from System Management to deviate from the Dispatch Plan or change their commitment or output in accordance with clause 7.6A.3(a).

System Management and Market Participants must comply with the Power System Operation Procedure.

7.7.5B. The quantity to be used ~~in~~ for the purposes of clauses 6.15.2(b)(i) and 7.13.1(eF) is System Management's estimate, determined in accordance with the Power System Operation Procedure, of the maximum amount of sent out energy, in MWh, which each Non-Scheduled Generator, by Trading Interval, would have ~~supplied~~ generated in the Trading Interval had a Dispatch Instruction not been issued.

...

Appendix 9: Relevant Level Determination

...

~~Step 4: For each Candidate Facility and Trading Interval identified in step 3(a) use the estimate provided by System Management to the IMO under clause 7.13.1(eF) as the quantity of~~

energy (in MWh) that would have been sent out by the Facility during the Trading Interval had a Dispatch Instruction not been issued for that Trading Interval.

Step 4: For each Candidate Facility and Trading Interval identified in step 3(a):

- (a) identify the actual quantity as determined in step 2 if:
 - i. System Management has provided the IMO with a revised estimate of the maximum quantity in accordance with clause 7.7.5A(c) and the Power System Operation Procedure; and
 - ii. the revised estimate of the maximum quantity is lower than the actual quantity as determined in step 2;
- (b) identify the actual quantity as determined in step 2 if:
 - i. step 4(a) does not apply; and
 - ii. the estimated maximum quantity provided by System Management to the IMO under clause 7.13.1(eF) is lower than the actual quantity (as specified in a Meter Data Submission covering the Facility and the Trading Interval); and
- (c) if steps 4(a) and (b) do not apply:
 - i. identify the revised estimate of the maximum quantity provided by System Management to the IMO in accordance with the Power System Operation Procedure specified in clause 7.7.5A; or
 - ii. if there is no revised estimate, identify the estimate provided by System Management under clause 7.13.1(eF).

...

Step 9: Identify, for each 12 month period identified in step 1(c), the following:

- (a) the Existing Facility Load for Scheduled Generation previously determined under this Appendix 9 for each Trading Interval in the 12 month period;
- ~~(b) the sent out generation (in MWh) for each Candidate Facility for each Trading Interval in the 12 month period that was used in the determination of the Existing Facility Load for Scheduled Generation for that Trading Interval; and~~
- (b) subject to step 9A, the sent out generation (in MWh) for each Candidate Facility and for each Trading Interval in that 12 month period, where that sent out generation was used to determine the CF Generation (which is one of the variables used to determine the Existing Facility Load for Scheduled Generation in step 7) for that Trading Interval; and

- (c) the 12 Trading Intervals occurring on separate Trading Days that were previously determined to have the highest Existing Facility Load for Scheduled Generation in the 12 month period.

Step 9A: For the purposes of step 9(b), if:

- (a) System Management has provided the IMO with a revised estimate of the maximum quantity in accordance with the Power System Operation Procedure specified in clause 7.7.5A;
- (b) the revised estimate relates to a Candidate Facility and a Trading Interval in a 12 month period identified in step 1(c); and
- (c) the IMO determined the sent out generation for that Candidate Facility and for that Trading Interval in accordance with step 4 before it received the revised estimate from System Management,

then the IMO must redetermine the sent out generation for that Candidate Facility and that Trading Interval in accordance with step 4.

