



INDEPENDENT
MARKET
OPERATOR

Final Rule Change Report

Title: Constrained On/Off Compensation removal where a Facility is non-compliant with Dispatch Instructions

RC 2012_25

Fast Track Rule Change Process

Date: 21 February 2013

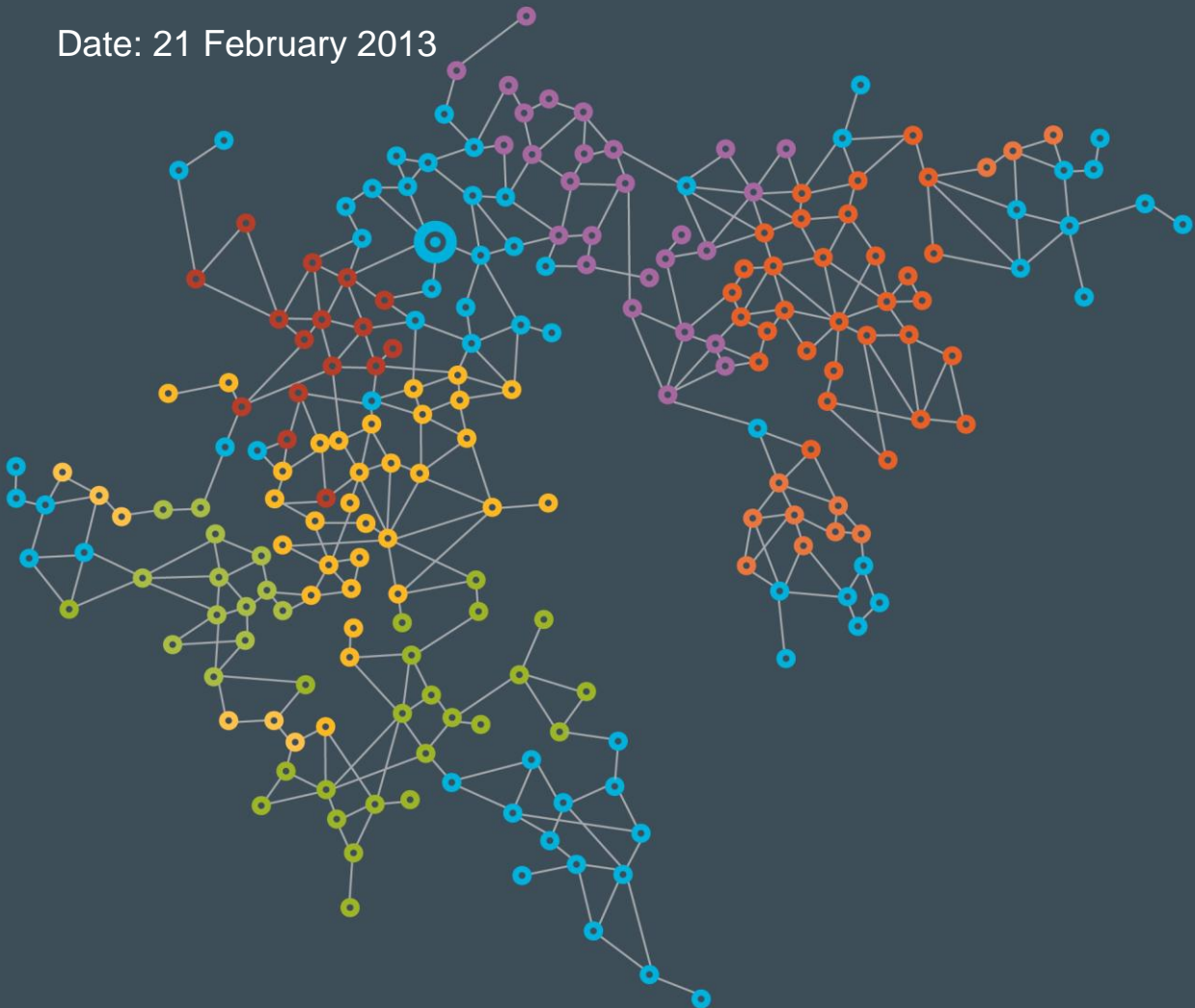


TABLE OF CONTENTS

1. Rule Change Process and Timetable.....	4
2. Proposed Amendments	4
2.1. The Rule Change Proposal.....	4
2.2. The IMO's Initial Assessment of the Proposal.....	5
3. Consultation	5
3.1. The Market Advisory Committee.....	5
3.2. Submissions received during the consultation period.....	6
3.3. The IMO's response to submissions received during the consultation period.....	7
3.4. Public Forums and Workshops	8
4. The IMO's Final Assessment.....	8
4.1. Additional Amendments to the Amending Rules	8
4.2. Wholesale Market Objectives	8
4.3. Practicality and Cost of Implementation	9
5. The IMO's Decision	9
5.1. Reasons for the IMO's Decision.....	9
6. Amending Rules.....	10
6.1. Commencement	10
6.2. Amending Rules	10
Appendix 1. Responses to Submissions received during the consultation period ..	12
Appendix 2. Further Amendments to the Proposed amending rules.....	14

Executive Summary

Proposed Amendments

This Rule Change Proposal seeks to amend a manifest error in the Market Rules where the process for adjusting Settlement Statements does not take into account situations where a Facility has not complied with their Dispatch Instruction or Dispatch Order as stipulated in clauses 6.16A and 6.16B respectively. The IMO proposes to amend clauses 9.16 and 9.19 to give the IMO the opportunity to adjust a Market Participant's Settlement Statement where a Market Participant has not adequately or appropriately complied with their Dispatch Instruction or Dispatch Order.

Consultation

The IMO initially presented the issue as part of the overview of Rule Changes to the Market Advisory Committee (MAC) at the 14 November 2012 meeting. The Pre Rule Change Proposal was subsequently presented at the 12 December 2012 MAC meeting where members agreed that the proposal sought to correct a manifest error and should be progressed under the Fast Track Rule Change Process.

The Rule Change Proposal was formally submitted on 21 January 2013 and the consultation period was held between 22 January 2013 and 12 February 2013.

The IMO received submissions from Alinta, System Management and Verve Energy during the consultation period. Out of session submissions were received from Community Electricity and Perth Energy. All the submissions received supported the proposed amendments.

Assessment against Wholesale Market Objectives

The IMO considers that the proposed amendments will allow the Market Rules to better achieve Wholesale Market Objectives (a) and (d), and are consistent with the remaining Wholesale Market Objectives.

Practicality and Cost of Implementation

No major costs or issues of practicality of implementation were identified in the Rule Change Proposal and none have subsequently been identified as part of the consultation on the proposal.

The IMO has identified that the proposed amendments will have a minor impact on the settlement system. Processes to allow for non-compliance flags in adjusting Settlement Statements will have to be implemented. This is a minor change and does not constitute a major cost.

The IMO's Decision

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

Next steps

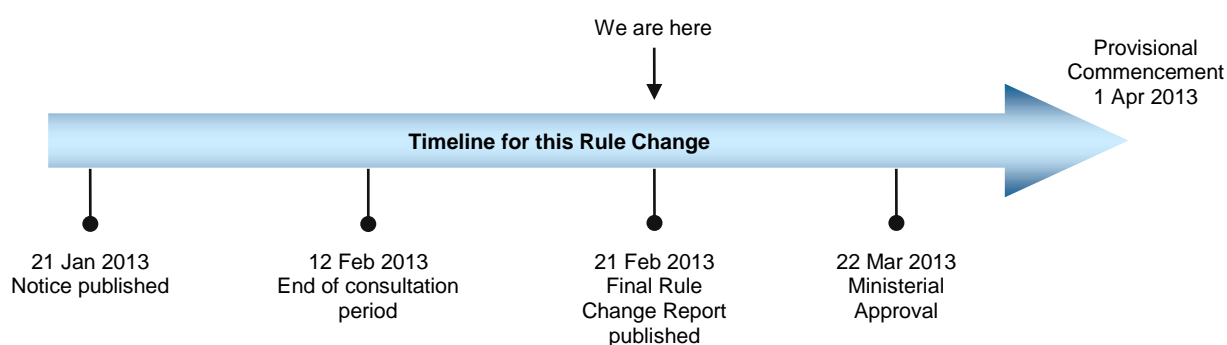
The Amending Rules will provisionally commence subject to Ministerial approval at **8.00 AM** on **1 April 2013**.

1. Rule Change Process and Timetable

On 21 January 2013, the IMO submitted a Rule Change Proposal regarding amendments to clauses 9.16.3, 9.16.3A and 9.19.1 of the Wholesale Electricity Market Rules (Market Rules).

This proposal is being processed using the Fast Track Rule Change Process, described in section 2.6 of the Market Rules. In accordance with clause 2.5.10 of the Market Rules the IMO decided to extend the timeframe for the preparation of the Final Rule Change Report. Further details of the extension are available on the Market Web Site.

The key dates in processing this Rule Change Proposal, as amended in the Extension Notice are:



All documents related to this Rule Change Proposal can be found on the Market Web Site: http://www.imowa.com.au/rc_2012_25

2. Proposed Amendments

2.1. The Rule Change Proposal

Where System Management informs the IMO that a Market Participant has not complied with a Dispatch Instruction and the IMO determines that the Market Participant has not adequately or appropriately complied with that Dispatch Instruction, the Market Rules give the IMO the power to reduce the relevant Out of Merit generation to zero. The result is that the Market Participant will not be paid any Constrained On or Constrained Off Compensation because the Facility was non-compliant with a Dispatch Instruction or Dispatch Order.

Due to an oversight in drafting of the Market Rules which introduced the Competitive Balancing and Load Following Markets (RC_2011_10), the current settlement process in the Market Rules do not appear to allow the IMO to make necessary adjustments to a Market Participant's Settlement Statement following determinations made with respect to these payments after the initial settlement run.

Neither System Management's requirement to provide the relevant non-complying information to the IMO, or the IMO's power to reduce the Out of Merit generation quantity to zero are subject to any express time constraints in the Market Rules (and in practical terms, may take some time to determine). Further, meter data which relates to the non-compliance period may be revised after the initial settlement run.

The IMO considered that the lack of ability to revise Settlement Statements following non-compliance was inconsistent with the design of Constrained On/Off Compensation as implemented under the Rule Change Proposal: Competitive Balancing and Load Following Market (RC_2011_10). To rectify this situation the IMO proposed to amend the settlement process

(clauses 9.16.3, 9.16.3A and 9.19.1) to give the IMO the opportunity to adjust a Market Participant's Settlement Statement when a Market Participant has not complied with its Dispatch Instruction or Dispatch Order.

The IMO's ability to update Settlement Statements with the results of its determinations with respects to Constrained On/Off Compensation needs to be progressed as soon as possible, so as to minimise the impact of interest accruing on payments and to maximise certainty to Market Participants on their settlement position.

For full details of the Rule Change Proposal please refer to the Market Web Site: http://www.imowa.com.au/rc_2012_25

2.2. The IMO's Initial Assessment of the Proposal

The IMO decided to process the Rule Change Proposal using the Fast Track Rule Change Process described in section 2.6 of the Market Rules, on the grounds that it satisfied the criterion in clause 2.5.9(b) of the Market Rules.

Clauses 2.5.9 states:

The IMO may subject a Rule Change Proposal to the Fast Track Rule Change Process if, in its opinion, the Rule Change Proposal:

- (a) is of a minor or procedural nature; or*
- (b) is required to correct a manifest error; or*
- (c) is urgently required and is essential for the safe, effective and reliable operation of the market or the SWIS.*

Under the current drafting, clauses 6.16A and 6.16B contemplate that the IMO has the ability to reduce a Facility's Out of Merit Generation to zero if the Facility has not adequately or appropriately followed its Dispatch Instruction. The ability to make this determination implies that there will be some form of adjustment in the settlement process (Settlement Statement) for these Facilities. However clause 9.16.3, which lists the reasons under which the IMO can undertake a process of adjusting Settlement Statements, does not take into account the situations contemplated under clauses 6.16A and 6.16B. As such, the IMO considered that the Rule Change Proposal satisfied the criterion in clause 2.5.9(b) and should therefore be progressed using the Fast Track Rule Change Process.

3. Consultation

3.1. The Market Advisory Committee

The Market Advisory Committee (MAC) discussed the proposed changes during the 14 November 2012 and 12 December 2012 meetings.

November 2012 MAC Meeting

Ms Suzanne Frame presented an overview of the issue to MAC members. The following points were raised during the MAC's discussion of this issue:

- Citing the complexity of the issue, Ms Jacinda Papps queried whether the Standard Rule Change Process would be more appropriate for this issue, because it would allow

stakeholders an additional round of consultation. The Chair noted that this issue was creating a financial impact on the market and thus there was a need to consider the trade-off of having a longer Rule Change process vis-à-vis market impact. Mr Stephen MacLean agreed that the issue was a manifest error and was comfortable with it being progressed as fast tracked.

- Mr Nenad Ninkov queried whether the IMO could change any settlement outcomes for any circumstance. Ms Jenny Laidlaw responded that the IMO has the ability to vary settlement outcomes but this depends upon the IMO disputing the initial invoice. Mr Ben Tan queried what the proposed time frame to dispute a settlement outcome would be. Ms Jenny Laidlaw responded that it would be the standard year for adjustments. The Chair noted that the compliance team had already determined which generators had not complied in July, August and September. Mr Geoff Gaston regarded that this proposal could correct some of the problems that had occurred in July and August. Ms Laidlaw noted that it would apply in situations since the start of the Balancing Market in which a Facility had not complied with Dispatch Instructions and had received erroneous payments.
- Mr Ninkov requested that more information be provided on the process that would be followed in changing the initial Invoice following a dispute. *[The IMO subsequently provided this information to Mr Ninkov].*

December 2012 MAC Meeting

Ms Suzanne Frame presented an overview of the Pre Rule Change Proposal: Constrained On/Off Compensation removal where a Facility is non-compliant with Dispatch Instructions (PRC_2012_25). The following point was raised during the MAC's discussion of this issue.

- Mr Andrew Stevens queried whether the Theoretical Energy Schedule (TES) could be recalculated as he believed that Verve Energy had proposed a rule change around this issue, noting that the two issues were related. Ms Frame confirmed that Verve previously raised an issue relating to the recalculation of TES, which had now been incorporated into a broader issue around the Adjustment Process. Ms Frame agreed that the issues were related, however noted that the issue that PRC_2012_25 sought to resolve was considered at the November MAC meeting and agreed by the MAC to constitute a manifest error. The issue around the recalculation of TES would most likely be required to be processed through the Standard Rule Change Process, hence it was decided to progress the issues separately.

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 consultation period

The consultation period for this Rule Change Proposal was held between 22 January 2013 and 12 February 2013. Alinta, System Management and Verve Energy requested to be consulted on this Rule Change Proposal and provided submissions to the IMO. Out of session submissions were received from Community Electricity and Perth Energy.

Alinta supported the proposed amendments and the decision to fast track the proposed amendments, however raised some concerns that a number of 'piecemeal' changes had been recently progressed to the Market Rules which were not necessarily addressing the underlying market design issues. In particular, Alinta was concerned that there is a lack of clarity in the Market Rules around a Market Participant's requirements to be compliant with a Dispatch Instruction.

Community Electricity supported the proposed amendments on the basis that the amendments would remove the perverse situation where a Market Participant could be financially rewarded when non-compliant with a Dispatch Instruction.

Perth Energy supported the proposed amendments on the basis that it was a manifest error which had the potential to significantly advantage some Market Participants at the expense of others. It noted the possibility that incorrect payments may have been being made since the start of the new Balancing Market on 1 July 2012. Given that adjustments to Non-STEM Settlement Statements could take place 11 months post the Trading Month that the settlement relates to, the last month available for making changes to the July 2012 month (Balancing Market start) would be June 2013, Perth Energy queried whether the IMO would be adjusting Settlement Statements from the start of the Balancing Market following the rule change. Perth Energy suggested that, given the nature of the obvious error, it would (uncharacteristically) support a retrospective rule change to correct errors going back to the start of the Balancing Market (1 July 2012) if this was required.

System Management supported the proposed amendments on the basis that it seeks to incentivize Market Participants in a way that supports System Management’s primary function, which is to maintain Power System Security and Reliability in the South West Interconnect System.

Verve Energy noted that the proposed drafting involved clauses and regarding both Dispatch Instructions and Dispatch Orders (instructions by System Management for a Facility or facilities in the Verve Energy Balancing Portfolio to vary output or consumption from the Dispatch Plan). It considered that the intent of the proposed drafting was appropriate and as such that adjustments should be made where any Facility is non-compliant. Verve also identified a possible disconnect between clause 9.16.3 and clauses 9.16.3A and 9.19.1. Verve Energy also provided some comments on redrafting and referencing to maintain clarity and consistency in the Market Rules.

The following table provides a summary of the responses received in regards to achievement of the Wholesale Market Objective Assessment:

Submitter	Wholesale Market Objective Assessment
Alinta	None provided.
Community Electricity	Consistent with Wholesale Market Objectives.
Perth Energy	Better achieves Wholesale Market Objectives (a) and (b) and does not impact the remaining Wholesale Market Objectives.
System Management	Better achieves Wholesale Market Objectives (a) and (d).
Verve Energy	Consistent with Wholesale Market Objectives.

A copy of all submissions in full received during the consultation period is available on the Market Web Site: http://www.imowa.com.au/rc_2012_25

3.3. The IMO’s response to submissions received during the consultation period

The IMO’s responses to each of the issues identified during the consultation period are presented in Appendix 1 of this Final Rule Change Report.

3.4. Public Forums and Workshops

No public workshop was held in regard to this Rule Change Proposal.

4. 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 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 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 nor has it commissioned a technical review in respect to this Rule Change Proposal. A summary of the views expressed in submissions and by the MAC are 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 public consultation period are outlined in the following sub-sections.

4.1. Additional Amendments to the Amending Rules

Following the public consultation period the IMO has made some additional changes to the proposed Amending Rules to:

- reflect suggestions received during the consultation period (as applicable); and
- incorporate a number of minor and typographical amendments to improve the overall integrity of the Amending Rules.
- the additional changes include amendments to clause 9.16.3 such that the situations in which the IMO may adjust settlements are clearly stated in a list format, and a minor adjustment to the proposed wording in clauses 9.16.3 and 9.16.3A(b) to improve clarity. See Appendix 2 for details.

4.2. Wholesale Market Objectives

The IMO considers that the Market Rules as a whole, if amended as presented in section 6.2, will not only be consistent with the Wholesale Market Objectives but will also allow the Market Rules to better achieve Wholesale Market Objective (a) and (d). The Amended Rules avoid rewarding non-compliant behavior and therefore promote the economically efficient supply of electricity to the market. Further, the amendments would ensure the long-term cost of electricity supplied to customers is minimized since compensation payments for non-compliant behavior are avoided.

The proposed amendments were sought to correct a manifest error in the Market Rules and the change is consistent with the intent in the previous rule change introducing the Balancing Market (RC_2011_10).

4.3. Practicality and Cost of Implementation

4.3.1. Cost:

No costs associated with implementing the proposed amendments have been identified by the IMO or submitting parties.

4.3.2. Practicality:

The IMO does not consider that there are any major issues with the practicality of implementation with regards to the proposed amendments. The IMO has identified that the proposed amendments will have a minor impact on the settlement system with implementing non-compliance flags in adjusting Settlement Statements. Submitting parties have not identified any issues with the practicality of implementation.

5. The IMO's Decision

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

5.1. Reasons for the IMO's Decision

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

- will allow the Market Rules to better achieve Wholesale Market Objective (a) and (d);
- are consistent with the remaining Wholesale Market Objectives;
- have the support of the MAC; and
- have the support of the submissions received during the consultation period.

Additional detail outlining the analysis behind the IMO's decision is outlined in section 4 of this Final Rule Change Report.

6. Amending Rules

6.1. Commencement

The amendments to the Market Rules resulting from this Rule Change Proposal will provisionally commence at **8.00 AM** on **1 April 2013**.

6.2. Amending Rules

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

- 9.16.3. The IMO must undertake a process for adjusting settlements (“**Adjustment Process**”) in accordance with clause 9.19. The purpose of the process is to review the relevant Settlement Statements which were issued in the nine months prior to the commencement of the Adjustment Process (“**Relevant Settlement Statements**”) to facilitate corrections resulting from:
- (a) Notices of Disagreement;
 - (b) the resolution of Disputes;
 - (c) revised metering data provided by Metering Data Agents; ~~and~~
 - (d) any revised Market Fee rate, System Operation Fee rate or Regulator Fee rate (as applicable); and
 - (e) any determinations made in accordance with clauses 6.16A.1(b)(i), 6.16A.2(b)(i), 6.16B.1(b)(i) or 6.16B.2(b)(i).

Adjustments may only be made to Relevant Settlement Statements. Adjustments may not be made to Settlement Statements outside of an Adjustment Process.

9.16.3A A Relevant Settlement Statement is:

- (a) Any STEM Settlement Statement or Non-STEM Settlement Statement that requires correction as the result of the resolution of a dispute raised under clause 2.19, or where the IMO has indicated under clause 9.20.7 that it will revise information in response to a Notice of Disagreement; and
- (b) Any Non-STEM Settlement Statement for which the Invoicing Date occurred in the month that is three, six or nine months prior to the start of the Adjustment Process, and for which the IMO has received revised metering data from a Metering Data Agent or made any determinations in accordance with clauses 6.16A.1(b)(i), 6.16A.2(b)(i), 6.16B.1(b)(i) or 6.16B.2(b)(i).

9.19.1. When undertaking an Adjustment Process the IMO must:

- (a) recalculate the amounts included in the Relevant Settlement Statements in accordance with this Chapter but taking into account any:
 - i. revised metering data which has been provided by Metering Data Agents;
 - ii. actions arising from a Notice of Disagreement; ~~and~~

- iii. the resolution of any Dispute; and
 - iv. determinations made under clauses 6.16A.1(b)(i), 6.16A.2(b)(i), 6.16B.1(b)(i) or 6.16B.2(b)(i); and
- (b) provide adjusted STEM Settlement Statements and adjusted Non-STEM Settlement Statements to Rule Participants in accordance with the timeline specified under clause 9.16.4 in respect of the relevant Adjustment Process.

Appendix 1. Responses to Submissions received during the consultation period

	Submitter	Comment/Change Requested	IMO's Response
1.	Alinta	While Alinta supports the Rule Change Proposal, it is concerned that a number of piecemeal changes to the Market Rules which have been progressed recently do not necessarily address the underlying market design issues. In particular, Alinta is concerned that there is currently a lack of clarity in the Market Rules around a Market Participant's requirements to be compliant with a Dispatch Instruction. Alinta notes that these issues appear to stem from the recent application of the concept of a Tolerance Range or Facility Tolerance Range (as applicable) to a Market Generator's compliance under the Market Rules.	The IMO acknowledges Alinta's concerns. Several manifest errors regarding the use of the terms 'Tolerance Range' and 'Facility Tolerance Range' in the Market Rules were presented in a discussion paper to the MAC at the 12 September 2012 meeting. The IMO has since drafted a Pre-Rule Change Proposal which also included clarification of dispatch compliance and reporting obligations and intends to present the proposed solutions at the next MAC meeting. A Rule Change Proposal is likely to be progressed under the fast track process following this presentation.
2.	Perth Energy	Perth Energy notes the possibility that incorrect constrained on/off payments have been made since the start of the new Balancing Market (1 July 2012). It would support retrospectively applying this rule change to correct payment. Perth Energy also notes that the last possible adjustment to Non-STEM Settlements for the first month of the Balancing Market (July 2012) would occur in June 2013. Perth Energy queried whether the IMO is intending to adjust all constrained on/off payments where a Facility had not complied with a Dispatch Instruction since July 2012.	The IMO intends to adjust Settlement Statements from July 2012 where it has determined that a Facility had not adequately or appropriately complied with a Dispatch Instruction. As Perth Energy notes, this revision falls within the 11 month period allow in the Market Rules (see clause 9.16.3A(b)). As such, the IMO does not consider it would be necessary to retrospectively apply the Amending Rules.

	Submitter	Comment/Change Requested	IMO's Response
3.	Verve Energy	Verve Energy notes that the Verve Energy Balancing Portfolio does not receive Dispatch Instructions, rather it receives Dispatch Orders. Verve Energy notes that the proposed drafting covers both a Market Participant's non-compliance to Dispatch Instructions as well as Verve Energy's non-compliance to Dispatch Orders. As such, Verve Energy recommends that the IMO consider amending the title and description of this Rule Change Proposal to make it clear that the intent is for the proposal to cover both Market Participants and the Verve Energy Balancing Portfolio.	The IMO acknowledges that the Verve Energy Balancing Portfolio receives Dispatch Orders rather than Dispatch Instructions. The IMO clarifies that the intention of the Rule Change Proposal was to apply to both Dispatch Orders and Dispatch Instructions such that no Facilities receive compensation following non-compliance regardless of the type of instruction. However, for consistency purposes, the IMO does not consider it appropriate to amend the title of the rule change or the description in the original Rule Change Proposal.
4.	Verve Energy	Verve Energy notes that clause 9.16.3 contains a significant amount of information and suggests a re- structuring of the clause to a list format style.	The IMO agrees with Verve Energy's recommendation and has restructured this clause. Please refer to Section 6.2.
5.	Verve Energy	Verve Energy recommends, for the purposes of clarity, to amend the drafting in clause 9.16.3A(b).	The IMO acknowledges Verve Energy's recommendation, however does not consider that Verve Energy's suggestion substantiates the clarity or improves the coherence of this clause.
6.	Verve Energy	Verve Energy notes that with the addition of a new sub clause 9.19.1(a)(iv), that there is a superfluous 'and' at the end of sub clause 9.19.1(a)ii.	The IMO considers this to be a typographical error which has been rectified in the proposed amendments.
7.	Verve Energy	Verve Energy identified a disconnection between clause 9.16.3 with clauses 9.16.3A and 9.19.1. Clause 9.16.3 of the Market Rules refers to adjustments arising from revisions of fees/fee rates. However, clauses 9.16.3A and 9.19.1 do not contain this reference and it is suggested that this disconnect be amended when the IMO deems it to be appropriate.	The IMO agrees with Verve Energy's submission and has subsequently included this issue into the rule issue log. However, as this suggestion is outside the scope of this Rule Change Proposal, the IMO will take this into consideration at a later date.

Appendix 2. Further Amendments to the proposed amending rules

The IMO has made some further amendments to the Amending Rules following the consultation period. These changes are as follows (~~deleted text~~, added text):

- 9.16.3. The IMO must undertake a process for adjusting settlements (“**Adjustment Process**”) in accordance with clause 9.19. The purpose of the process is to review the relevant Settlement Statements which were issued in the nine months prior to the commencement of the Adjustment Process (“**Relevant Settlement Statements**”) to facilitate corrections resulting from
- (a) Notices of Disagreement;
 - (b) the resolution of Disputes;
 - (c) ~~___~~ revised metering data provided by Metering Data Agents;
 - (d) any revised Market Fee rate, System Operation Fee rate or Regulator Fee rate (as applicable); and
 - (e) ~~due to~~ any determinations made in accordance with clauses 6.16A.1(b)(i), 6.16A.2(b)(i), 6.16B.1(b)(i) or 6.16B.2(b)(i).

Adjustments may only be made to Relevant Settlement Statements. Adjustments may not be made to Settlement Statements outside of an Adjustment Process.

9.16.3A A Relevant Settlement Statement is:

- (a) Any STEM Settlement Statement or Non-STEM Settlement Statement that requires correction as the result of the resolution of a dispute raised under clause 2.19, or where the IMO has indicated under clause 9.20.7 that it will revise information in response to a Notice of Disagreement; and
- (b) Any Non-STEM Settlement Statement for which the Invoicing Date occurred in the month that is three, six or nine months prior to the start of the Adjustment Process, and for which the IMO has received revised metering data from a Metering Data Agent or ~~due to~~made any determinations ~~made~~ in accordance with clauses 6.16A.1(b)(i), 6.16A.2(b)(i), 6.16B.1(b)(i) or 6.16B.2(b)(i).

9.19.1. When undertaking an Adjustment Process the IMO must:

- (a) recalculate the amounts included in the Relevant Settlement Statements in accordance with this Chapter but taking into account any:
 - i. revised metering data which has been provided by Metering Data Agents;
 - ii. actions arising from a Notice of Disagreement; ~~and~~
 - iii. the resolution of any Dispute; and
 - iv. determinations made under clauses 6.16A.1(b)(i), 6.16A.2(b)(i), 6.16B.1(b)(i) or 6.16B.2(b)(i); and

- (b) provide adjusted STEM Settlement Statements and adjusted Non-STEM Settlement Statements to Rule Participants in accordance with the timeline specified under clause 9.16.4 in respect of the relevant Adjustment Process.