



1921 Gallows Road, 3rd Floor
Tysons Corner, VA 22182
Phone (703) 962 9800
Fax (703) 962 9850
www.nodalexchange.com

February 9, 2015

VIA CFTC PORTAL

Commodity Futures Trading Commission
Attention: Chris Kirkpatrick, Secretary
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

**Re: CEA Section 5c(c)(1) and CFTC Regulation 40.6(a) Certification:
Amendments to Minimum Block Trade Size for Electric Power Futures
Contracts**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission ("Commission" or "CFTC") Regulation 40.6(a), Nodal Exchange, LLC ("Nodal Exchange" or "Exchange") is submitting amendments to the minimum size of block trades, which are provided in Appendix B (Minimum Block Sizes for Nodal Exchange Contracts) of the Nodal Exchange Rulebook ("Rules"). The Exchange is amending the block trade minimum quantity for all electric power futures contracts to 5 lots, as discussed below. The Exchange intends to implement the amendments to Appendix B of the Rules in 10 business days on February 24, 2015.

The amendments to the minimum block size of some of the Exchange's electric power futures contracts will match the minimum block size of comparable electric power futures contracts currently offered by a competing designated contract market. As set forth in Exhibit A, Nodal Exchange offers electric power futures contracts that are nearly identical in all respects to the electric power futures contracts currently listed by ICE Futures US ("ICE Futures") in 1 MW lot sizes, except for the minimum block size that is 5 lots on ICE Futures.

Since all of the Exchange's electric power futures contracts are very similar and generally interrelated, the amendments will also establish the minimum block size for all of the Exchange's remaining electric power futures, or "Nodal-only," contracts

to 5 lots. Compatible minimum block sizes are necessary because the Nodal-only contracts typically trade as components of larger transaction structures involving the Exchange's electric power futures contracts that are comparable to the ICE Futures contracts in Exhibit A. For example, of the Exchange's unique electric power futures contracts that traded over the past year, over 99% were traded as locational spreads involving the Exchange's electric power futures contracts in Exhibit A. In order to match the minimum block size set by ICE Futures and maintain compatible minimum block sizes for all of the Exchange's electric power futures contracts, the Exchange is amending Appendix B of the Rules to reduce the minimum block size to 5 lots for all electric power futures contracts offered by the Exchange. The amendments are indicated in red on Exhibit B, attached hereto.

Exchange management has assessed the amendments to Appendix B of the Rules, and their compliance with applicable provisions of the Commodity Exchange Act ("CEA"), including the Commission's Regulations and the Core Principles. Nodal Exchange has identified that amended Appendix B of the Rules may affect the following Core Principles as follows:

Core Principle 2 - Compliance with Rules: Consistent with the Exchange's Rules, the amendments to Appendix B of the Rules provide minimum block trade size information necessary to comply with the regulatory requirements regarding block trades. The amendments to Appendix B of the Rules assist the Exchange's participants to comply with the Exchange's block trade Rules.

Core Principle 7 - Availability of General Information: The Exchange will post on its website (www.nodalexchange.com) the amended Appendix B of the Rules providing updated block trade minimum size information.

Core Principle 9 - Execution of Transactions: Core Principle 9 expressly permits a designated contract market ("DCM") to maintain rules that authorize transactions for bona fide business purposes that are executed away from the DCM's central limit order book, including rules for executing block trades. Pursuant to the Commission's authority granted to DCMs, the amendments to Appendix B of the Rules establish minimum block trade sizes as described above in compliance with Core Principle 9.

Pursuant to Section 5c(c)(1) of the CEA and the Commission's Regulation 40.6(a), the Exchange certifies that the amendments to Appendix B of the Rules comply with the CEA and the Commission's Regulations thereunder. The minimum block size of 5 lots for many of the Exchange's electric power futures contracts is currently in place at a competing exchange for corresponding contracts. The Exchange is not aware of any opposing views expressed regarding this amendment. Nodal Exchange certifies that this submission has been concurrently posted on the Nodal Exchange website at www.nodalexchange.com.

If you have any question or need additional information regarding this submission, please contact me at 703-962-9835 or Herrera@nodalexchange.com.

Sincerely,



Anita Herrera
Chief Regulatory Officer

Attachments:

Exhibit A: ICE Futures US Contracts and Nodal Exchange Equivalents for 1 MW Contracts

Exhibit B: Nodal Exchange Rulebook Appendix B - Minimum Block Sizes for Nodal Exchange Contracts