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March 20, 2015

**VIA Portal**

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

**Re: CFTC Regulation 40.6(a) Emergency Rule Certification: Notification of Revised Nodal Exchange MISO Power Energy Futures Contracts**

Dear Mr. Kirkpatrick:

Nodal Exchange, LLC ("Nodal Exchange" or "Exchange") is hereby providing immediate notice to the Commodity Futures Trading Commission ("CFTC" or "Commission") that on March 2, 2015, the Exchange revised the Nodal Exchange Rulebook Appendix A (Contract Specifications) ("Appendix A") for all MISO Day-Ahead Energy futures contracts consistent with the revisions implemented by MISO as of March 2, 2015. Accordingly, the Exchange is self-certifying amendments to Appendix A pursuant to Commission Regulation 40.6(a). The amended Appendix A is attached hereto, indicating the specific data that is being revised for this amendment.

MISO is the independent third party regional transmission organization that coordinates the movement of wholesale electricity within its region. As approved by the Federal Energy Regulatory Commission ("FERC") on February 27, 2015 (150 FERC ¶61,143 (February 27, 2015)), MISO revised the underlying calculation model for both Day-Ahead Market and Real-Time Market; however, MISO only revised terminology related to the Day-Ahead Market. MISO replaced the term "LMP" with the term "Ex Post LMP", which occurs in the description of the Final Settlement Price, including the download links therein that reference the MISO files online.

Exchange management has assessed the amendments to Appendix A and its compliance with applicable provisions of the Commodity Exchange Act ("Act"), including the Commissions Regulations and the Core Principles. Nodal Exchange has identified that the amendments to Appendix A may affect the following Core Principles as follows:

**Compliance with the Rules:** Consistent with the Exchange's Rules, the amendments to Appendix A provides accurate information to enable participants to comply with the

Exchange's rules regarding position limits, position accountability, and reporting requirements.

Core Principle 3 – Contracts Not Readily Subject to Manipulation: The amended Appendix A provides an accurate representation of the underlying cash market of the applicable futures contracts offered on the Exchange. Since the amended information is in accordance with revisions approved by FERC and implemented by MISO, which is the independent third party operator of its regional power markets, it further demonstrates that the Exchange's contracts are not readily susceptible to manipulation.

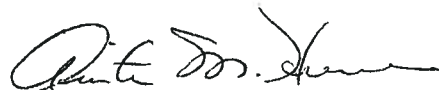
Core Principle 7 – Availability of General Information: The Exchange has posted the amended Appendix A on its website ([www.nodalexchange.com](http://www.nodalexchange.com)).

Pursuant to Section 5c(c) of the Act and the Commission's Regulation 40.6, the Exchange certifies that the revised Appendix A complies with the Act and the Commission's Regulations thereunder. There have not been any opposing views expressed regarding these amendments.

Nodal Exchange certifies that this submission has been concurrently posted on the Nodal Exchange website at [www.nodalexchange.com](http://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](mailto:Herrera@nodalexchange.com).

Sincerely,



Anita Herrera  
General Counsel & Chief Regulatory Officer

Attachments:  
Appendix A – Contract Specifications