

May 26, 2020

VIA CFTC PORTAL

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

Re: Broker Incentive Program for Electric Power Options Contracts: Certification Submission No. 20-022 Pursuant to Regulation 40.6(a)

Dear Mr. Kirkpatrick:

Pursuant to Commission Regulation 40.6(a), Nodal Exchange, LLC (“Nodal Exchange” or “Exchange”) is notifying the Commission by self-certification of the Exchange’s intention to implement the Nodal Exchange Incentive Payments to Brokers for Electric Power Options Program (“Program”) for the submission of option block trades by brokers. The complete description of the Program is separately included and segregated as Exhibit 1 for which the Exchange seeks confidential treatment. A redacted version is also included. This filing is effective immediately and the Program will commence in 10 business days on June 9, 2020.

Exchange management has assessed the Program and certifies its compliance with the Commodity Exchange Act (“Act”), including the Commissions Regulations and the Core Principles. Specifically, the Program complies with Core Principle 2 (Compliance with Rules), Core Principle 4 (Prevention of Market Disruption), Core Principle 9 (Execution of Transactions), Core Principle 12 (Protection of Market Participants), and Core Principle 18 (Recordkeeping).

The Program is offered to all brokers authorized by the Exchange to submit negotiated block trades executed by Exchange participants in accordance with the rules of the Exchange. All electric power options contracts listed by the Exchange are included in this Program. At the end of the quarter, incentives are payable to brokers that submit block trades on the Exchange’s electric power options contracts.

The Program is structured so that there are no incentives for participants to trade, or to engage in market abuses such as manipulative trading or wash trades. The Program does not impact order execution priority or otherwise give participants any execution preference or advantage. The Program does not impact the Exchange’s ability to perform

its trade practice and market surveillance obligations. The Exchange's surveillance staff and compliance personnel will continue to monitor trading to prevent manipulative trading and market abuse. The Program is subject to the Exchange's recordkeeping rules which comply with the Commodity Exchange Act.

Nodal Exchange certifies that, concurrent with this submission, a notice of certification was posted on the Nodal Exchange website at www.nodalexchange.com. There have not been any opposing views expressed regarding the Program.

If you have any questions or need additional information regarding this submission, please contact me at 703-962-9853 or markotic@nodalexchange.com.

Sincerely,

/s/ Max Markotic

Director of Compliance

Attachments:

1. Exhibit 1 - REDACTED – Electric Power Options – Broker Incentive Program
2. Exhibit 1 - CONFIDENTIAL – Electric Power Options – Broker Incentive Program
3. Request for Confidential Treatment