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July 13, 2017

VIA CFTC PORTAL

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

Re: Nodal Exchange Power Incentive Program III: Certification Submission No. 17-018 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 that it intends to implement trading incentives on the Exchange’s power contracts, referred to herein as the Nodal Exchange Power Incentive Program III (“Program”). 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 Exchange intends to implement the Program in 10 business days on July 27, 2017.

Exchange management has assessed the Program 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 Program may potentially affect the following Core Principles:

Core Principle 2 - Compliance with Rules: All participants in the Program must comply with and be subject to Exchange Rules. Participants violating Exchange Rules will be disqualified at the discretion of the Exchange.

Core Principle 4 – Prevention of Market Disruption: The Program does not impact the Exchange’s ability to perform its trade practice and market surveillance obligations pursuant to the Act and Commission Regulations. The Exchange’s surveillance staff and compliance personnel will monitor trading in the Program’s products to prevent manipulative trading and market abuse.

Core Principle 9 – Execution of Transactions: The Program incentives do not impact the Exchange’s process for order execution.

Core Principle 12 – Protection of Markets and Market Participants: Section VI of the Nodal Exchange Rulebook protects the market and market participants from abusive, disruptive, fraudulent, noncompetitive and unfair conduct and trade practices. To be eligible for the Program, participants must agree to comply with Exchange Rules and be subject to the Exchange’s jurisdiction.

Core Principle 18 – Recordkeeping: The Program is subject to the Exchange’s record retention policies, which comply with the Act and the Commissions Regulations.

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

Nodal Exchange certifies that, concurrent with this submission, a redacted version of the Program was posted on the Nodal Exchange website at www.nodalexchange.com.

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

Sincerely,

/s/ Anita Herrera

General Counsel and Chief Regulatory Officer

Attachments:

Exhibit 1: Nodal Exchange Power Incentive Program III - Confidential

Exhibit 1: Nodal Exchange Power Incentive Program III – Redacted
Request for Confidential Treatment