



Nasdaq Futures, Inc.  
2929 Walnut Street  
Philadelphia, PA 19104 / USA  
[business.nasdaq.com/futures](http://business.nasdaq.com/futures)

## Rule Self-Certification

July 17, 2017

Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

Re: **Rule Certification Extending a  
Market Maker Program**  
**Reference File: SR-NFX-2017-29**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Section 40.6 of the Commission’s regulations thereunder, NASDAQ Futures, Inc. (“NFX” or “Exchange”) submits this self-certification to extend the Designated Market Maker program (the “DMM Program”) for energy contracts that the Exchange has listed pursuant to Appendix A of the Exchange Rulebook (the “Energy Contracts”).<sup>1</sup> The terms and conditions of the DMM Program will remain the same<sup>2</sup>, with the exception of one change noted in Confidential Exhibit B, until the program’s expiration on September 30, 2017. NFX is extending the existing DMM Program while the Exchange consults with NFX market participants and develops a new market maker program. NFX anticipates the new DMM Program going into effect on October 1, 2017.

The Exchange believes that the DMM Program complies with Core Principle 4 (Monitoring of Trading), Core Principle 9 (Execution of Transactions) and Core Principle 12 (Protection of Market Participants). The DMM Program will not impact order execution priority or otherwise give participants any execution preference or advantage. The DMM Program will not impact the Exchange’s ability to perform its trade practice and market surveillance obligations under the Act and Exchange staff will monitor trading in the Program’s products to

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<sup>1</sup> See [NFX Rulebook Appendix A – Listed Contracts](#)

<sup>2</sup> See Exhibit A, SR-NFX-2017-14, filed April 13, 2017.

prevent manipulative trading and market abuse. Additionally, the Exchange has systems to track Program participants' volume to ensure proper distribution of earned incentives. Finally, NFX rules include prohibitions against fraudulent, non-competitive, unfair or abusive practices. The Exchange has reviewed the designated contract market core principles as set forth in the Act in connection with the amendments presented herein. Consistent with Core Principle 7 - Availability of General Information, the Exchange will post general information, including the NFX Rulebook as amended herein, on its website: [business.nasdaq.com/futures](http://business.nasdaq.com/futures)

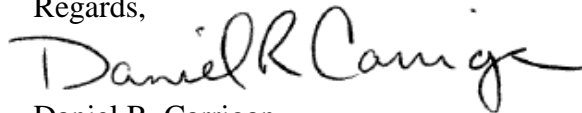
The Exchange has reviewed the designated contract market core principles as set forth in the Act in connection with the amendments presented herein. Consistent with Core Principle 7 - Availability of General Information, the Exchange will post general information, including the NFX Rulebook as amended herein, on its website: [business.nasdaq.com/futures](http://business.nasdaq.com/futures).

### **Certifications**

There were no opposing views among NFX's Board of Directors, members or market participants. The Exchange hereby certifies that the rule amendments set forth herein comply with the Act and the Commission's regulations thereunder. The Exchange also certifies that notice of pending certification and a copy of this submission have been concurrently posted on the Exchange's website: [business.nasdaq.com/futures](http://business.nasdaq.com/futures).

If you require any additional information regarding this submission, please contact Aravind (Andy) Menon at (301) 978-8416 or [aravind.menon@nasdaq.com](mailto:aravind.menon@nasdaq.com). Please refer to SR-NFX-2017-29 in any related correspondence.

Regards,



Daniel R. Carrigan  
President

Exhibit A  
SR-NFX-2017-14

Exhibit B  
Cost estimate for DMM Program through September 30, 2017 (under separate cover)

Exhibit A To SR-NFX-2017- 29



Nasdaq Futures, Inc.  
2929 Walnut Street  
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## Rule Self-Certification

April 13, 2017

Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**Re: Rule Certification Extending a  
Market Maker Program  
Reference File: SR-NFX-2017-14**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Section 40.6 of the Commission’s regulations thereunder, NASDAQ Futures, Inc. (“NFX” or “Exchange”) submits this self-certification to extend the Designated Market Maker program (the “DMM Program”) for energy contracts that the Exchange has listed pursuant to Appendix A of the Exchange Rulebook (the “Energy Contracts”).<sup>1</sup> The terms and conditions of the DMM Program will remain the same until the program’s expiration on July 31, 2017. NFX is extending the existing DMM Program while the Exchange consults with NFX market participants and develops a new market maker program. NFX anticipates the new DMM Program going into effect on August 1, 2017.

The Exchange believes that the DMM Program complies with Core Principle 4 (Monitoring of Trading), Core Principle 9 (Execution of Transactions) and Core Principle 12 (Protection of Market Participants). The DMM Program will not impact order execution priority or otherwise give participants any execution preference or advantage. The DMM Program will not impact the Exchange’s ability to perform its trade practice and market surveillance obligations under the Act and Exchange staff will monitor trading in the Program’s products to prevent manipulative trading and market abuse. Additionally, the Exchange has systems to track Program participants’ volume to ensure proper distribution of earned incentives. Finally, NFX rules include prohibitions against fraudulent, non-competitive, unfair or abusive practices.

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<sup>1</sup> See NFX Rulebook Appendix A – Listed Contracts

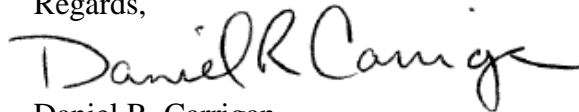
The Exchange has reviewed the designated contract market core principles as set forth in the Act in connection with the amendments presented herein. Consistent with Core Principle 7 - Availability of General Information, the Exchange will post general information, including the NFX Rulebook as amended herein, on its website: [business.nasdaq.com/futures](http://business.nasdaq.com/futures).

### **Certifications**

There were no opposing views among NFX's Board of Directors, members or market participants. The Exchange hereby certifies that the rule amendments set forth herein comply with the Act and the Commission's regulations thereunder. The Exchange also certifies that notice of pending certification and a copy of this submission have been concurrently posted on the Exchange's website at [business.nasdaq.com/futures](http://business.nasdaq.com/futures).

If you require any additional information regarding this submission, please contact Aravind (Andy) Menon at (301) 978-8416 or [steve.matthews@nasdaq.com](mailto:steve.matthews@nasdaq.com). Please refer to SR-NFX-2017-14 in any related correspondence.

Regards,

A handwritten signature in black ink that reads "Daniel R. Carrigan". The signature is fluid and cursive, with the first name "Daniel" and last name "Carrigan" clearly legible.

Daniel R. Carrigan  
President

Exhibit A

SR-NFX-2016-41

Exhibit B

Cost estimate for DMM Program through July 31, 2017 (under separate cover)

# SUBMISSION COVER SHEET

**IMPORTANT – Confidential Treatment is requested**

Organization Name: NASDAQ Futures, Inc.

Organization Type: DCM

Registered Entity Identifier: SR-NFX-2016-41

Submission Number: 1604-0617-2715-30

Submission Date: 04/06/16 05:27:15 PM

Submission Type: Rule - 40.6(a) Rule Certification

Submission Description: Further details on adopting a new market maker program.

Rule Numbers: Energy DMM Program



Nasdaq Futures, Inc.  
1900 Market Street  
Philadelphia, PA 19103 / USA  
business.nasdaq.com/futures

## **Rule Self-Certification**

April 6, 2016

Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**Re: Rule Certification for a  
Market Maker Program  
Reference File: SR-NFX-2016-41**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Section 40.6 of the Commission’s regulations thereunder, NASDAQ Futures, Inc. (“NFX” or “Exchange”) submits this self-certification to adopt a market maker program (the “Program”) for energy contracts that the Exchange has listed pursuant to Appendix A of the Exchange Rulebook (the “Energy Contracts”), as may be amended from time to time.<sup>1</sup> The Program will become effective on April 24, 2016 and will terminate on April 28, 2017.

Participants in the Energy DMM Program will be selected by Exchange staff using the process described in the Designated Market Maker Solicitation for Appointment in Energy Futures and Options Products (the “Solicitation”), previously filed with the Commission.<sup>2</sup> NFX aims to select around 25 Designated Market Makers (“DMMs”) for the Program from among the Futures Participants and Authorized Customers who submitted proposals in response to the Solicitation, with a view to having up to 30 DMMs participating at any particular time. The basic terms and conditions of the Energy DMM Program are attached hereto as Exhibit A. The confidential details of the Energy DMM Program are set forth in Confidential Appendix 1, attached under separate cover.

The Exchange believes that the Program complies with Core Principle 4 (Monitoring of Trading), Core Principle 9 (Execution of Transactions) and Core Principle 12

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<sup>1</sup> See NFX Rulebook Appendix A – Listed Contracts

<sup>2</sup> See SR-NFX-2016-40, filed April 4, 2016.

(Protection of Market Participants). The Program will not impact order execution priority or otherwise give participants any execution preference or advantage. The Program will not impact the Exchange's ability to perform its trade practice and market surveillance obligations under the Act and Exchange staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. Additionally, the Exchange has systems to track Program participants' volume to ensure proper distribution of earned incentives. Finally, NFX rules include prohibitions against fraudulent, non-competitive, unfair or abusive practices.

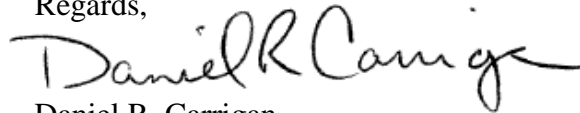
The Exchange has reviewed the designated contract market core principles as set forth in the Act in connection with the amendments presented herein. Consistent with Core Principle 7 - Availability of General Information, the Exchange will post general information, including the NFX Rulebook as amended herein, on its website: [business.nasdaq.com/futures](http://business.nasdaq.com/futures).

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If you require any additional information regarding this submission, please contact Stephen Matthews at (301) 978-8458 or [steve.matthews@nasdaq.com](mailto:steve.matthews@nasdaq.com). Please refer to SR-NFX-2016-41 in any related correspondence.

Regards,

A handwritten signature in black ink, appearing to read "Daniel R. Carrigan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel R. Carrigan  
President

Exhibit A

Confidential Appendix 1 (attached under separate cover)



**Exhibit A**  
**NFX Energy DMM Program**

**Program Purpose**

The purpose of the NFX Energy DMM Program (the “Energy DMM Program”) is to incentivize market makers selected by NFX (“DMMs”) to provide liquidity in the products and combinations listed below. The resulting additional liquidity should benefit all participants in the market.

**Product Scope**

All of the energy contracts listed pursuant to Appendix A of the Exchange Rulebook (collectively, the “Products”) and the following combinations:

BFQ/GOQ  
BFQ/OQ  
BFQ/RQ  
OQ/GOQ  
TQ/BFQ  
TQ/OQ  
TQ/RQ

**Eligible Participants**

NFX selects DMMs from among those applicants who respond to NFX’s “*Designated Market Maker Solicitation for Appointment in Energy Futures and Options Products*” (the “Solicitation”) previously filed with the Commodity Futures Trading Commission (see SR-NFX-2016-40, filed April 4, 2016) and posted on NFX’s website. In the Solicitation, NFX invited Futures Participants and Authorized Customers to apply for DMM appointments.

**Program Term**

The Energy DMM Program will expire on April 28, 2017.

**Obligations**

DMMs’ specific quoting and size obligations are set forth in individual agreements with NFX.

**Incentives**

DMMs may receive monthly incentive payments from the Exchange pursuant to the terms of their individual agreements with NFX.

**Monitoring and Termination of Status**

NFX shall monitor trading activity and each DMM's performance and shall retain the right to revoke Energy DMM Program participant status if it concludes after review that a participant has failed to meet its obligations or no longer meets the eligibility requirements of the Energy DMM Program.