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March 10, 2023

VIA CFTC PORTAL

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

Re: CFTC Regulation 40.2(a) Certification: Notification of Product Offered for Trading on Nodal Exchange, LLC – New Jersey Pennsylvania Dual Qualified Renewable Energy Certificate Class 2 Vintage 2026 Future

Dear Mr. Kirkpatrick:

Nodal Exchange, LLC ("Nodal Exchange" or "Exchange") is notifying the Commodity Futures Trading Commission ("CFTC" or "Commission") that pursuant to Commission Regulation 40.2(a), the Exchange is self-certifying the listing of 8 new environmental futures contracts and 8 new environmental options contracts for trading on Nodal Exchange beginning on or after March 17, 2023. The contract specifications describing these new Exchange futures and options contracts are attached to this letter as Exhibit A, to be added to the Nodal Exchange Rulebook Appendix A – Contract Specifications. The deliverable supply analysis has been segregated as Exhibit B, for which confidential treatment is requested. The reporting levels, accountability levels, and position limits for these contracts is attached to this letter as Exhibit C, which will be added to the Nodal Exchange Rulebook Appendix C -Reporting Levels, Accountability Levels and Position Limits.

Exchange management has assessed the Exchange's contracts' compliance with applicable provisions of the Commodity Exchange Act ("Act"), including the Commissions Regulations thereunder and the Core Principles. Regulatory compliance of Nodal Exchange's futures and options contracts is mostly addressed in the Nodal Exchange Rulebook, concisely explained as follows:

<u>Core Principle 2 - Compliance with the Rules</u>: Trading in the Exchange's contracts will be subject to the Nodal Exchange Rulebook in Section IV, describing trading procedures, and Section VI, which establishes trading codes of conduct, sound trading practices, and identifies prohibited trading behavior and abuses. In addition, trading behavior and activity will be subject to extensive monitoring and surveillance by the Exchange's Division of Market Administration and Surveillance. The Exchange's Compliance Department has the authority

to address disciplinary matters through investigation and enforcement procedures in accordance with Section VII of the Exchange Rulebook.

<u>Core Principle 3 - Contracts not Readily Susceptible to Manipulation</u>: A description of the underlying cash markets and deliverable supply analysis for the Exchange's new contracts is provided in attached Exhibit B, which demonstrates compliance that the Exchange's new contracts are not readily susceptible to manipulation.

<u>Core Principle 4 - Prevention of Market Disruption</u>: Trading in the Exchange's contracts will be subject to the Nodal Exchange Rulebook Section VI, which prohibits disruptive trading behavior and manipulation, subject to monitoring and surveillance by the Exchange's Division of Market Administration and Surveillance.

<u>Core Principle 5 - Position Limitations or Accountability</u>: The spot-month speculative position limits for the Exchange's contracts are set at less than 25% of the deliverable supply in the respective underlying market. In addition, the Exchange monitors and enforces position accountability rules for individual single-month and all-months combined, which are also within 25% of deliverable supply. The new contract reporting levels, accountability levels and position limits are provided in attached Exhibit C, to be added to the Nodal Exchange Rulebook Appendix C – Reporting Levels, Position Accountability Levels and Position Limits.

<u>Core Principle 7 - Availability of General Information</u>: The Exchange will post general information, including the contract specifications for the new contracts, Exchange fees, and the Nodal Exchange Rulebook, on the Exchange's website: <u>www.nodalexchange.com</u>.

<u>Core Principle 8 - Daily publication of Trading Information</u>: The Exchange will publish daily information on settlement prices, volume, open interest and opening and closing ranges for the Exchange's actively traded contracts on its website.

<u>Core Principle 9 - Execution of Transactions</u>: The Exchange's new contracts will be available on the Exchange's electronic trading screen that is a central limit order book ("CLOB"). The CLOB provides the market with the ability to execute the Exchange's contracts from the interaction of multiple bids and multiple offers within a predetermined, nondiscretionary automated trade matching and execution algorithm.

<u>Core Principle 10 - Trade Information</u>: The CLOB will maintain all information with respect to each order and each consummated trade, as well as all other information relating to the trade environment that determines the matching and clearing of trades. As such, any order submitted to the CLOB can be tracked from the time it is entered into the system until the time that it is matched, canceled or otherwise removed.

<u>Core Principle 11 - Financial Integrity of Transactions</u>: The Exchange has entered into a clearing arrangement with Nodal Clear, a derivatives clearing organization subject to Part

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39 of the Commission Regulations. The new contracts executed on the CLOB or as a block trade will be subject to the Exchange Rulebook provisions for submission to Nodal Clear for clearing as described in Section V.

<u>Core Principle 12 - Protection of Markets and Market Participants</u>: Section VI of the Nodal Exchange Rulebook protects the market and market participants from abusive, disruptive, fraudulent, noncompetitive and unfair conduct and trade practices. The new contracts are subject to these rules that apply to all transactions in the Exchange's contracts.

<u>Core Principle 13 - Disciplinary Procedures</u>: Section VII of the Nodal Exchange Rulebook describes the disciplinary procedures of the Exchange that authorize the Exchange to discipline, suspend, or expel anyone on the Exchange that violates these rules.

<u>Core Principle 14 - Dispute Resolution</u>: Section VIII of the Nodal Exchange Rulebook establishes rules concerning alternative dispute resolution, which provide for the resolution of disputes between or among Exchange users through the NFA arbitration program. Under Section VIII, arbitration is available for all disputes, controversies or claims among all Exchange users relating to Exchange activities.

Pursuant to Section 5c(c) of the Act and the Commission's Regulation 40.2(a), the Exchange certifies that the Exchange's new futures and options contracts to be listed comply with the Act and the Commission's Regulations thereunder.

Nodal Exchange certifies that this submission has been concurrently posted on the Nodal Exchange website at <u>www.nodalexchange.com</u>.

If you have any question or need additional information regarding the above, please contact the undersigned at 703-962-9853 or <u>markotic@nodalexchange.com</u> or Anita Herrera, Chief Regulatory Officer & General Counsel at 703-962-9835 or <u>Herrera@nodalexchange.com</u>.

Sincerely, /s/ Max Markotic Senior Director

Attachments:

Exhibit A: March 17, 2023, Addition to Nodal Exchange Appendix A - Contract Specifications

Confidential Exhibit B: Deliverable Supply Analysis (*Confidential Treatment Requested*)

Exhibit C: March 17, 2023, Addition to Nodal Exchange Appendix C - Reporting Levels, Accountability Levels and Position Limits

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Exhibit A – Contract Specifications (Rulebook Appendix A)

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2023 Future</u>

ITEM	SPECIFICATION
Contract Description	Physically delivered Class 2 Renewable Energy Certificates and Tier 2 Alternative Energy Credits ("Class 2 RECs" and "Tier 2 AECs") where a REC and an AEC is an electronic certificate issued by the PJM Environmental Information System Generation Attribute Tracking System ("PJM GATS") for generation simultaneously qualifying for the Pennsylvania Tier 2 and New Jersey Class 2 portions of the Renewable Portfolio Standard programs.
Contract Code	NEG
Settlement Method	Physical Delivery
Hours of Trading	As defined at http://www.nodalexchange.com
Unit of Trading	1 lot
Lot Size	100 MWh representing 100 qualifying Class 2/Tier 2 RECs
Currency	US Dollars
Minimum Tick	\$0.01 per MWh
Settlement Price Precision	\$0.01 per MWh
Last Trading Day	Three Business Days prior to the last Business Day of the delivery month
Delivery Day	Three Business Days after the Last Trading Day (Last Business Day of the delivery month)
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
Deliverable Product	RECs/AECs eligible for delivery are those which are eligible to meet the Tier 2/Class 2 requirements in each of the states of Pennsylvania and New Jersey where; the Pennsylvania requirements are those representing Tier 2/Class 2 alternative energy sources (as defined in Pennsylvania Statutes Title 73 P.S. Trade and Commerce § 1648.2) which are eligible to meet the Tier II alternative energy source requirement of the Pennsylvania Alternative Energy Portfolio Standards Act as specified in Pennsylvania Statutes Title 73 Chapter 18F and issued by PJM GATs; the New Jersey requirements are those which are eligible to meet the Class II Renewable Energy Portfolio Standard promulgated under N.J.A.C. 14:8 verified and qualified by the NJ Board of Public Utilities. Tier 2 AECs and Class 2 RECs acceptable for delivery are those having a vintage or energy year designation that corresponds to the specified vintage of the expiring contract.

ITEM	SPECIFICATION
	located outside of the State of New Jersey, the seller must also deliver the Class 2 Renewable Energy Certification Form.
Registry	PJM-EIS Generation Attribute Tracking System (PJM GATS)
Daily Settlement Price	Determined by the Exchange based on exchange activity, other market data, and extrapolation to traded contracts, as appropriate
Final Settlement Price	The Daily Settlement Price on the Last Trading Day
Delivery	On the Last Trading Day, the Exchange will provide the Clearing House with information identifying the Participants with delivery obligations for the purpose of issuing Tender and invoice notices in accordance with Section IX (Physical Delivery and Settlement) of the Nodal Clear Rulebook.
Final Settlement (Payment) Date	Three or four Business Days after the Last Trading Day on the successful delivery of the underlying instruments (if the delivery confirmation is available by 11:30am on the third Business Day after the Last Trading Day, the payment will be made on the same day during the Midday Margin Cycle; if it is available after 11:30am, the payment will be made on the next Margin Cycle which will be the next Business Day)
Position Limit	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2024 Future</u>

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delivered Class 2 Renewable Energy Certificates and Tier 2 Alternative redits ("Class 2 RECs" and "Tier 2 AECs") where a REC and an AEC is an c certificate issued by the PJM Environmental Information System on Attribute Tracking System ("PJM GATS") for generation simultaneously for the Pennsylvania Tier 2 and New Jersey Class 2 portions of the le Portfolio Standard programs.
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contracts beginning with August in the year prior to the corresponding ear through September of the corresponding vintage year. The Exchange ny other calendar month contract set off the standard listing cycle.
As eligible for delivery are those which are eligible to meet the Tier 2/Class 2 ents in each of the states of Pennsylvania and New Jersey where; the ania requirements are those representing Tier 2/Class 2 alternative energy as defined in Pennsylvania Statutes Title 73 P.S. Trade and Commerce § which are eligible to meet the Tier II alternative energy source requirement anal Alternative Energy Portfolio Standards Act as specified in ania Statutes Title 73 Chapter 18F and issued by PJM GATs; the New Jersey ents are those which are eligible to meet the Class II Renewable Energy standard promulgated under N.J.A.C. 14:8 verified and qualified by the NJ Public Utilities. Tier 2 AECs and Class 2 RECs acceptable for delivery are ving a vintage or energy year designation that corresponds to the specified f the expiring contract.
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ITEM	SPECIFICATION
	located outside of the State of New Jersey, the seller must also deliver the Class 2 Renewable Energy Certification Form.
Registry	PJM-EIS Generation Attribute Tracking System (PJM GATS)
Daily Settlement Price	Determined by the Exchange based on exchange activity, other market data, and extrapolation to traded contracts, as appropriate
Final Settlement Price	The Daily Settlement Price on the Last Trading Day
Delivery	On the Last Trading Day, the Exchange will provide the Clearing House with information identifying the Participants with delivery obligations for the purpose of issuing Tender and invoice notices in accordance with Section IX (Physical Delivery and Settlement) of the Nodal Clear Rulebook.
Final Settlement (Payment) Date	Three or four Business Days after the Last Trading Day on the successful delivery of the underlying instruments (if the delivery confirmation is available by 11:30am on the third Business Day after the Last Trading Day, the payment will be made on the same day during the Midday Margin Cycle; if it is available after 11:30am, the payment will be made on the next Margin Cycle which will be the next Business Day)
Position Limit	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2025 Future</u>

hysically delivered Class 2 Renewable Energy Certificates and Tier 2 Alternative nergy Credits ("Class 2 RECs" and "Tier 2 AECs") where a REC and an AEC is an lectronic certificate issued by the PJM Environmental Information System Generation Attribute Tracking System ("PJM GATS") for generation simultaneously ualifying for the Pennsylvania Tier 2 and New Jersey Class 2 portions of the tenewable Portfolio Standard programs. JEI hysical Delivery as defined at http://www.nodalexchange.com lot
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ECs/AECs eligible for delivery are those which are eligible to meet the Tier 2/Class 2 equirements in each of the states of Pennsylvania and New Jersey where; the rennsylvania requirements are those representing Tier 2/Class 2 alternative energy ources (as defined in Pennsylvania Statutes Title 73 P.S. Trade and Commerce § 648.2) which are eligible to meet the Tier II alternative energy source requirement of the Pennsylvania Alternative Energy Portfolio Standards Act as specified in rennsylvania Statutes Title 73 Chapter 18F and issued by PJM GATs; the New Jersey equirements are those which are eligible to meet the Class II Renewable Energy
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ITEM	SPECIFICATION
	located outside of the State of New Jersey, the seller must also deliver the Class 2 Renewable Energy Certification Form.
Registry	PJM-EIS Generation Attribute Tracking System (PJM GATS)
Daily Settlement Price	Determined by the Exchange based on exchange activity, other market data, and extrapolation to traded contracts, as appropriate
Final Settlement Price	The Daily Settlement Price on the Last Trading Day
Delivery	On the Last Trading Day, the Exchange will provide the Clearing House with information identifying the Participants with delivery obligations for the purpose of issuing Tender and invoice notices in accordance with Section IX (Physical Delivery and Settlement) of the Nodal Clear Rulebook.
Final Settlement (Payment) Date	Three or four Business Days after the Last Trading Day on the successful delivery of the underlying instruments (if the delivery confirmation is available by 11:30am on the third Business Day after the Last Trading Day, the payment will be made on the same day during the Midday Margin Cycle; if it is available after 11:30am, the payment will be made on the next Margin Cycle which will be the next Business Day)
Position Limit	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2026 Future</u>

ITEM	SPECIFICATION
Contract Description	Physically delivered Class 2 Renewable Energy Certificates and Tier 2 Alternative Energy Credits ("Class 2 RECs" and "Tier 2 AECs") where a REC and an AEC is an electronic certificate issued by the PJM Environmental Information System Generation Attribute Tracking System ("PJM GATS") for generation simultaneously qualifying for the Pennsylvania Tier 2 and New Jersey Class 2 portions of the Renewable Portfolio Standard programs.
Contract Code	NEJ
Settlement Method	Physical Delivery
Hours of Trading	As defined at http://www.nodalexchange.com
Unit of Trading	1 lot
Lot Size	100 MWh representing 100 qualifying Class 2/Tier 2 RECs
Currency	US Dollars
Minimum Tick	\$0.01 per MWh
Settlement Price Precision	\$0.01 per MWh
Last Trading Day	Three Business Days prior to the last Business Day of the delivery month
Delivery Day	Three Business Days after the Last Trading Day (Last Business Day of the delivery month)
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
Deliverable Product	RECs/AECs eligible for delivery are those which are eligible to meet the Tier 2/Class 2 requirements in each of the states of Pennsylvania and New Jersey where; the Pennsylvania requirements are those representing Tier 2/Class 2 alternative energy sources (as defined in Pennsylvania Statutes Title 73 P.S. Trade and Commerce § 1648.2) which are eligible to meet the Tier II alternative energy source requirement of the Pennsylvania Alternative Energy Portfolio Standards Act as specified in Pennsylvania Statutes Title 73 Chapter 18F and issued by PJM GATs; the New Jersey requirements are those which are eligible to meet the Class II Renewable Energy Portfolio Standard promulgated under N.J.A.C. 14:8 verified and qualified by the NJ Board of Public Utilities. Tier 2 AECs and Class 2 RECs acceptable for delivery are those having a vintage or energy year designation that corresponds to the specified vintage of the expiring contract.

ITEM	SPECIFICATION
	located outside of the State of New Jersey, the seller must also deliver the Class 2 Renewable Energy Certification Form.
Registry	PJM-EIS Generation Attribute Tracking System (PJM GATS)
Daily Settlement Price	Determined by the Exchange based on exchange activity, other market data, and extrapolation to traded contracts, as appropriate
Final Settlement Price	The Daily Settlement Price on the Last Trading Day
Delivery	On the Last Trading Day, the Exchange will provide the Clearing House with information identifying the Participants with delivery obligations for the purpose of issuing Tender and invoice notices in accordance with Section IX (Physical Delivery and Settlement) of the Nodal Clear Rulebook.
Final Settlement (Payment) Date	Three or four Business Days after the Last Trading Day on the successful delivery of the underlying instruments (if the delivery confirmation is available by 11:30am on the third Business Day after the Last Trading Day, the payment will be made on the same day during the Midday Margin Cycle; if it is available after 11:30am, the payment will be made on the next Margin Cycle which will be the next Business Day)
Position Limit	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2027 Future</u>

ITEM	SPECIFICATION
Contract Description	Physically delivered Class 2 Renewable Energy Certificates and Tier 2 Alternative Energy Credits ("Class 2 RECs" and "Tier 2 AECs") where a REC and an AEC is an electronic certificate issued by the PJM Environmental Information System Generation Attribute Tracking System ("PJM GATS") for generation simultaneously qualifying for the Pennsylvania Tier 2 and New Jersey Class 2 portions of the Renewable Portfolio Standard programs.
Contract Code	NEK
Settlement Method	Physical Delivery
Hours of Trading	As defined at http://www.nodalexchange.com
Unit of Trading	1 lot
Lot Size	100 MWh representing 100 qualifying Class 2/Tier 2 RECs
Currency	US Dollars
Minimum Tick	\$0.01 per MWh
Settlement Price Precision	\$0.01 per MWh
Last Trading Day	Three Business Days prior to the last Business Day of the delivery month
Delivery Day	Three Business Days after the Last Trading Day (Last Business Day of the delivery month)
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
Deliverable Product	RECs/AECs eligible for delivery are those which are eligible to meet the Tier 2/Class 2 requirements in each of the states of Pennsylvania and New Jersey where; the Pennsylvania requirements are those representing Tier 2/Class 2 alternative energy sources (as defined in Pennsylvania Statutes Title 73 P.S. Trade and Commerce § 1648.2) which are eligible to meet the Tier II alternative energy source requirement of the Pennsylvania Alternative Energy Portfolio Standards Act as specified in Pennsylvania Statutes Title 73 Chapter 18F and issued by PJM GATs; the New Jersey requirements are those which are eligible to meet the Class II Renewable Energy Portfolio Standard promulgated under N.J.A.C. 14:8 verified and qualified by the NJ Board of Public Utilities. Tier 2 AECs and Class 2 RECs acceptable for delivery are those having a vintage or energy year designation that corresponds to the specified vintage of the expiring contract.
	For deliveries of New Jersey Class 2 RECs generated from a resource recovery facility

ITEM	SPECIFICATION
	located outside of the State of New Jersey, the seller must also deliver the Class 2 Renewable Energy Certification Form.
Registry	PJM-EIS Generation Attribute Tracking System (PJM GATS)
Daily Settlement Price	Determined by the Exchange based on exchange activity, other market data, and extrapolation to traded contracts, as appropriate
Final Settlement Price	The Daily Settlement Price on the Last Trading Day
Delivery	On the Last Trading Day, the Exchange will provide the Clearing House with information identifying the Participants with delivery obligations for the purpose of issuing Tender and invoice notices in accordance with Section IX (Physical Delivery and Settlement) of the Nodal Clear Rulebook.
Final Settlement (Payment) Date	Three or four Business Days after the Last Trading Day on the successful delivery of the underlying instruments (if the delivery confirmation is available by 11:30am on the third Business Day after the Last Trading Day, the payment will be made on the same day during the Midday Margin Cycle; if it is available after 11:30am, the payment will be made on the next Margin Cycle which will be the next Business Day)
Position Limit	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2028 Future</u>

ITEM	SPECIFICATION
Contract Description	Physically delivered Class 2 Renewable Energy Certificates and Tier 2 Alternative Energy Credits ("Class 2 RECs" and "Tier 2 AECs") where a REC and an AEC is an electronic certificate issued by the PJM Environmental Information System Generation Attribute Tracking System ("PJM GATS") for generation simultaneously qualifying for the Pennsylvania Tier 2 and New Jersey Class 2 portions of the Renewable Portfolio Standard programs.
Contract Code	NEL
Settlement Method	Physical Delivery
Hours of Trading	As defined at http://www.nodalexchange.com
Unit of Trading	1 lot
Lot Size	100 MWh representing 100 qualifying Class 2/Tier 2 RECs
Currency	US Dollars
Minimum Tick	\$0.01 per MWh
Settlement Price Precision	\$0.01 per MWh
Last Trading Day	Three Business Days prior to the last Business Day of the delivery month
Delivery Day	Three Business Days after the Last Trading Day (Last Business Day of the delivery month)
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
Deliverable Product	RECs/AECs eligible for delivery are those which are eligible to meet the Tier 2/Class 2 requirements in each of the states of Pennsylvania and New Jersey where; the Pennsylvania requirements are those representing Tier 2/Class 2 alternative energy sources (as defined in Pennsylvania Statutes Title 73 P.S. Trade and Commerce § 1648.2) which are eligible to meet the Tier II alternative energy source requirement of the Pennsylvania Alternative Energy Portfolio Standards Act as specified in Pennsylvania Statutes Title 73 Chapter 18F and issued by PJM GATs; the New Jersey requirements are those which are eligible to meet the Class II Renewable Energy Portfolio Standard promulgated under N.J.A.C. 14:8 verified and qualified by the NJ Board of Public Utilities. Tier 2 AECs and Class 2 RECs acceptable for delivery are those having a vintage or energy year designation that corresponds to the specified vintage of the expiring contract.
	For deliveries of New Jersey Class 2 RECs generated from a resource recovery facility

ITEM	SPECIFICATION
	located outside of the State of New Jersey, the seller must also deliver the Class 2 Renewable Energy Certification Form.
Registry	PJM-EIS Generation Attribute Tracking System (PJM GATS)
Daily Settlement Price	Determined by the Exchange based on exchange activity, other market data, and extrapolation to traded contracts, as appropriate
Final Settlement Price	The Daily Settlement Price on the Last Trading Day
Delivery	On the Last Trading Day, the Exchange will provide the Clearing House with information identifying the Participants with delivery obligations for the purpose of issuing Tender and invoice notices in accordance with Section IX (Physical Delivery and Settlement) of the Nodal Clear Rulebook.
Final Settlement (Payment) Date	Three or four Business Days after the Last Trading Day on the successful delivery of the underlying instruments (if the delivery confirmation is available by 11:30am on the third Business Day after the Last Trading Day, the payment will be made on the same day during the Midday Margin Cycle; if it is available after 11:30am, the payment will be made on the next Margin Cycle which will be the next Business Day)
Position Limit	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2029 Future</u>

Physically delivered Class 2 Renewable Energy Certificates and Tier 2 Alternative Energy Credits ("Class 2 RECs" and "Tier 2 AECs") where a REC and an AEC is an electronic certificate issued by the PJM Environmental Information System Generation Attribute Tracking System ("PJM GATS") for generation simultaneously qualifying for the Pennsylvania Tier 2 and New Jersey Class 2 portions of the Renewable Portfolio Standard programs. NEM
Physical Delivery
As defined at http://www.nodalexchange.com
1 lot
100 MWh representing 100 qualifying Class 2/Tier 2 RECs
US Dollars
\$0.01 per MWh
\$0.01 per MWh
Three Business Days prior to the last Business Day of the delivery month
Three Business Days after the Last Trading Day (Last Business Day of the delivery month)
Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
RECs/AECs eligible for delivery are those which are eligible to meet the Tier 2/Class 2 requirements in each of the states of Pennsylvania and New Jersey where; the Pennsylvania requirements are those representing Tier 2/Class 2 alternative energy sources (as defined in Pennsylvania Statutes Title 73 P.S. Trade and Commerce § 1648.2) which are eligible to meet the Tier II alternative energy source requirement of the Pennsylvania Alternative Energy Portfolio Standards Act as specified in Pennsylvania Statutes Title 73 Chapter 18F and issued by PJM GATs; the New Jersey requirements are those which are eligible to meet the Class II Renewable Energy Portfolio Standard promulgated under N.J.A.C. 14:8 verified and qualified by the NJ Board of Public Utilities. Tier 2 AECs and Class 2 RECs acceptable for delivery are those having a vintage or energy year designation that corresponds to the specified vintage of the expiring contract.

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Position Limit	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2030 Future</u>

SPECIFICATION
Physically delivered Class 2 Renewable Energy Certificates and Tier 2 Alternative Energy Credits ("Class 2 RECs" and "Tier 2 AECs") where a REC and an AEC is an electronic certificate issued by the PJM Environmental Information System Generation Attribute Tracking System ("PJM GATS") for generation simultaneously qualifying for the Pennsylvania Tier 2 and New Jersey Class 2 portions of the Renewable Portfolio Standard programs.
NEN
Physical Delivery
As defined at http://www.nodalexchange.com
1 lot
100 MWh representing 100 qualifying Class 2/Tier 2 RECs
US Dollars
\$0.01 per MWh
\$0.01 per MWh
Three Business Days prior to the last Business Day of the delivery month
Three Business Days after the Last Trading Day (Last Business Day of the delivery month)
Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
RECs/AECs eligible for delivery are those which are eligible to meet the Tier 2/Class 2 requirements in each of the states of Pennsylvania and New Jersey where; the Pennsylvania requirements are those representing Tier 2/Class 2 alternative energy sources (as defined in Pennsylvania Statutes Title 73 P.S. Trade and Commerce § 1648.2) which are eligible to meet the Tier II alternative energy source requirement of the Pennsylvania Alternative Energy Portfolio Standards Act as specified in Pennsylvania Statutes Title 73 Chapter 18F and issued by PJM GATs; the New Jersey requirements are those which are eligible to meet the Class II Renewable Energy Portfolio Standard promulgated under N.J.A.C. 14:8 verified and qualified by the NJ Board of Public Utilities. Tier 2 AECs and Class 2 RECs acceptable for delivery are those having a vintage or energy year designation that corresponds to the specified vintage of the expiring contract.

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Position Limit	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2023 Option</u>

ITEM	SPECIFICATION
Contract Description	An Option on the corresponding month of the New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class 2 Vintage 2023 Future
Option Style	European
Underlying Contract	NEG
Hours of Trading	As defined at http://www.nodalexchange.com
Contract Size per Lot	1 lot of the Underlying Contract
Unit of Trading	1 lot, as defined in Contract Size per lot
Strike Price	A minimum of ten Strike Prices in increments of \$0.05 above and below the at-the- money Strike Price. The at-the-money strike price is the closest interval nearest to the previous day's Settlement Price of the Underlying Contract. Strike Price boundaries are adjusted according to futures price movements. User-defined Strike Prices are allowed in \$0.05 increments.
Currency	US Dollars
Minimum Tick	\$0.001 per MWh
Settlement Price Precision	\$0.001 per MWh
Last Trading Day	At 4:00 pm EPT on the 15th calendar day of the delivery month. Where the 15th calendar day is not a Business Day, the Last Trading Day shall be the first Business Day following the 15th calendar day of the delivery month
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
Premium	The premium on the Option is paid from the buyer to the seller on the next settlement cycle following the Transaction
Daily Settlement Price	Determined by the Exchange based on Exchange activity, other market data, and extrapolation to traded Option contracts, as appropriate
Exercise	Exercise of In-the-Money Options is automatic on the Last Trading Day unless the Exchange is notified by 5:30 pm EPT on the Last Trading Day (1) to allow the In-the-Money Options to expire without exercise or (2) to exercise expiring Out-of-the-Money Options
Settlement Method	Exercise into Underlying Contracts
Position Limit	Same with underlying contracts. Option positions are weighted by Option delta and combined with Underlying Contracts position. Underlying contracts' position limits can be found at

ITEM	SPECIFICATION
	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2024 Option</u>

ITEM	SPECIFICATION
Contract Description	An Option on the corresponding month of the New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class 2 Vintage 2024 Future
Option Style	European
Underlying Contract	NEH
Hours of Trading	As defined at http://www.nodalexchange.com
Contract Size per Lot	1 lot of the Underlying Contract
Unit of Trading	1 lot, as defined in Contract Size per lot
Strike Price	A minimum of ten Strike Prices in increments of \$0.05 above and below the at-the- money Strike Price. The at-the-money strike price is the closest interval nearest to the previous day's Settlement Price of the Underlying Contract. Strike Price boundaries are adjusted according to futures price movements. User-defined Strike Prices are allowed in \$0.05 increments.
Currency	US Dollars
Minimum Tick	\$0.001 per MWh
Settlement Price Precision	\$0.001 per MWh
Last Trading Day	At 4:00 pm EPT on the 15th calendar day of the delivery month. Where the 15th calendar day is not a Business Day, the Last Trading Day shall be the first Business Day following the 15th calendar day of the delivery month
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
Premium	The premium on the Option is paid from the buyer to the seller on the next settlement cycle following the Transaction
Daily Settlement Price	Determined by the Exchange based on Exchange activity, other market data, and extrapolation to traded Option contracts, as appropriate
Exercise	Exercise of In-the-Money Options is automatic on the Last Trading Day unless the Exchange is notified by 5:30 pm EPT on the Last Trading Day (1) to allow the In-the-Money Options to expire without exercise or (2) to exercise expiring Out-of-the-Money Options
Settlement Method	Exercise into Underlying Contracts
Position Limit	Same with underlying contracts. Option positions are weighted by Option delta and combined with Underlying Contracts position. Underlying contracts' position limits can be found at

ITEM	SPECIFICATION
	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2025 Option</u>

ITEM	SPECIFICATION
Contract Description	An Option on the corresponding month of the New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class 2 Vintage 2025 Future
Option Style	European
Underlying Contract	NEI
Hours of Trading	As defined at http://www.nodalexchange.com
Contract Size per Lot	1 lot of the Underlying Contract
Unit of Trading	1 lot, as defined in Contract Size per lot
Strike Price	A minimum of ten Strike Prices in increments of \$0.05 above and below the at-the- money Strike Price. The at-the-money strike price is the closest interval nearest to the previous day's Settlement Price of the Underlying Contract. Strike Price boundaries are adjusted according to futures price movements. User-defined Strike Prices are allowed in \$0.05 increments.
Currency	US Dollars
Minimum Tick	\$0.001 per MWh
Settlement Price Precision	\$0.001 per MWh
Last Trading Day	At 4:00 pm EPT on the 15th calendar day of the delivery month. Where the 15th calendar day is not a Business Day, the Last Trading Day shall be the first Business Day following the 15th calendar day of the delivery month
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
Premium	The premium on the Option is paid from the buyer to the seller on the next settlement cycle following the Transaction
Daily Settlement Price	Determined by the Exchange based on Exchange activity, other market data, and extrapolation to traded Option contracts, as appropriate
Exercise	Exercise of In-the-Money Options is automatic on the Last Trading Day unless the Exchange is notified by 5:30 pm EPT on the Last Trading Day (1) to allow the In-the-Money Options to expire without exercise or (2) to exercise expiring Out-of-the-Money Options
Settlement Method	Exercise into Underlying Contracts
Position Limit	Same with underlying contracts. Option positions are weighted by Option delta and combined with Underlying Contracts position. Underlying contracts' position limits can be found at

ITEM	SPECIFICATION
	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2026 Option</u>

ITEM	SPECIFICATION
Contract Description	An Option on the corresponding month of the New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class 2 Vintage 2026 Future
Option Style	European
Underlying Contract	NEJ
Hours of Trading	As defined at http://www.nodalexchange.com
Contract Size per Lot	1 lot of the Underlying Contract
Unit of Trading	1 lot, as defined in Contract Size per lot
Strike Price	A minimum of ten Strike Prices in increments of \$0.05 above and below the at-the- money Strike Price. The at-the-money strike price is the closest interval nearest to the previous day's Settlement Price of the Underlying Contract. Strike Price boundaries are adjusted according to futures price movements. User-defined Strike Prices are allowed in \$0.05 increments.
Currency	US Dollars
Minimum Tick	\$0.001 per MWh
Settlement Price Precision	\$0.001 per MWh
Last Trading Day	At 4:00 pm EPT on the 15th calendar day of the delivery month. Where the 15th calendar day is not a Business Day, the Last Trading Day shall be the first Business Day following the 15th calendar day of the delivery month
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.
Premium	The premium on the Option is paid from the buyer to the seller on the next settlement cycle following the Transaction
Daily Settlement Price	Determined by the Exchange based on Exchange activity, other market data, and extrapolation to traded Option contracts, as appropriate
Exercise	Exercise of In-the-Money Options is automatic on the Last Trading Day unless the Exchange is notified by 5:30 pm EPT on the Last Trading Day (1) to allow the In-the-Money Options to expire without exercise or (2) to exercise expiring Out-of-the-Money Options
Settlement Method	Exercise into Underlying Contracts
Position Limit	Same with underlying contracts. Option positions are weighted by Option delta and combined with Underlying Contracts position. Underlying contracts' position limits can be found at

ITEM	SPECIFICATION
	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF
Margin Unit	US Dollars

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2027 Option</u>

ITEM	SPECIFICATION						
Contract Description	An Option on the corresponding month of the New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class 2 Vintage 2027 Future						
Option Style	European						
Underlying Contract	NEK						
Hours of Trading	As defined at http://www.nodalexchange.com						
Contract Size per Lot	1 lot of the Underlying Contract						
Unit of Trading	1 lot, as defined in Contract Size per lot						
Strike Price	A minimum of ten Strike Prices in increments of \$0.05 above and below the at-the- money Strike Price. The at-the-money strike price is the closest interval nearest to the previous day's Settlement Price of the Underlying Contract. Strike Price boundaries are adjusted according to futures price movements. User-defined Strike Prices are allowed in \$0.05 increments.						
Currency	US Dollars						
Minimum Tick	\$0.001 per MWh						
Settlement Price Precision	\$0.001 per MWh						
Last Trading Day	At 4:00 pm EPT on the 15th calendar day of the delivery month. Where the 15th calendar day is not a Business Day, the Last Trading Day shall be the first Business Day following the 15th calendar day of the delivery month						
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.						
Premium	The premium on the Option is paid from the buyer to the seller on the next settlement cycle following the Transaction						
Daily Settlement Price	Determined by the Exchange based on Exchange activity, other market data, and extrapolation to traded Option contracts, as appropriate						
Exercise	Exercise of In-the-Money Options is automatic on the Last Trading Day unless the Exchange is notified by 5:30 pm EPT on the Last Trading Day (1) to allow the In-the-Money Options to expire without exercise or (2) to exercise expiring Out-of-the-Money Options						
Settlement Method	Exercise into Underlying Contracts						
Position Limit	Same with underlying contracts. Option positions are weighted by Option delta and combined with Underlying Contracts position. Underlying contracts' position limits can be found at						

ITEM	SPECIFICATION					
	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF					
Margin Unit	US Dollars					

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2028 Option</u>

ITEM	SPECIFICATION						
Contract Description	An Option on the corresponding month of the New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class 2 Vintage 2028 Future						
Option Style	European						
Underlying Contract	NEL						
Hours of Trading	As defined at http://www.nodalexchange.com						
Contract Size per Lot	1 lot of the Underlying Contract						
Unit of Trading	1 lot, as defined in Contract Size per lot						
Strike Price	A minimum of ten Strike Prices in increments of \$0.05 above and below the at-the- money Strike Price. The at-the-money strike price is the closest interval nearest to the previous day's Settlement Price of the Underlying Contract. Strike Price boundaries are adjusted according to futures price movements. User-defined Strike Prices are allowed in \$0.05 increments.						
Currency	US Dollars						
Minimum Tick	\$0.001 per MWh						
Settlement Price Precision	\$0.001 per MWh						
Last Trading Day	At 4:00 pm EPT on the 15th calendar day of the delivery month. Where the 15th calendar day is not a Business Day, the Last Trading Day shall be the first Business Day following the 15th calendar day of the delivery month						
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.						
Premium	The premium on the Option is paid from the buyer to the seller on the next settlement cycle following the Transaction						
Daily Settlement Price	Determined by the Exchange based on Exchange activity, other market data, and extrapolation to traded Option contracts, as appropriate						
Exercise	Exercise of In-the-Money Options is automatic on the Last Trading Day unless the Exchange is notified by 5:30 pm EPT on the Last Trading Day (1) to allow the In-the-Money Options to expire without exercise or (2) to exercise expiring Out-of-the-Money Options						
Settlement Method	Exercise into Underlying Contracts						
Position Limit	Same with underlying contracts. Option positions are weighted by Option delta and combined with Underlying Contracts position. Underlying contracts' position limits can be found at						

ITEM	SPECIFICATION					
	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF					
Margin Unit	US Dollars					

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2029 Option</u>

ITEM	SPECIFICATION						
Contract Description	An Option on the corresponding month of the New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class 2 Vintage 2029 Future						
Option Style	European						
Underlying Contract	NEM						
Hours of Trading	As defined at http://www.nodalexchange.com						
Contract Size per Lot	1 lot of the Underlying Contract						
Unit of Trading	1 lot, as defined in Contract Size per lot						
Strike Price	A minimum of ten Strike Prices in increments of \$0.05 above and below the at-the- money Strike Price. The at-the-money strike price is the closest interval nearest to the previous day's Settlement Price of the Underlying Contract. Strike Price boundaries are adjusted according to futures price movements. User-defined Strike Prices are allowed in \$0.05 increments.						
Currency	US Dollars						
Minimum Tick	\$0.001 per MWh						
Settlement Price Precision	\$0.001 per MWh						
Last Trading Day	At 4:00 pm EPT on the 15th calendar day of the delivery month. Where the 15th calendar day is not a Business Day, the Last Trading Day shall be the first Business Day following the 15th calendar day of the delivery month						
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.						
Premium	The premium on the Option is paid from the buyer to the seller on the next settlement cycle following the Transaction						
Daily Settlement Price	Determined by the Exchange based on Exchange activity, other market data, and extrapolation to traded Option contracts, as appropriate						
Exercise	Exercise of In-the-Money Options is automatic on the Last Trading Day unless the Exchange is notified by 5:30 pm EPT on the Last Trading Day (1) to allow the In-the-Money Options to expire without exercise or (2) to exercise expiring Out-of-the-Money Options						
Settlement Method	Exercise into Underlying Contracts						
Position Limit	Same with underlying contracts. Option positions are weighted by Option delta and combined with Underlying Contracts position. Underlying contracts' position limits can be found at						

ITEM	SPECIFICATION					
	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF					
Margin Unit	US Dollars					

<u>New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class</u> <u>2 Vintage 2030 Option</u>

ITEM	SPECIFICATION						
Contract Description	An Option on the corresponding month of the New Jersey-Pennsylvania Dual Qualified Renewable Energy Certificates Class 2 Vintage 2030 Future						
Option Style	European						
Underlying Contract	NEN						
Hours of Trading	As defined at http://www.nodalexchange.com						
Contract Size per Lot	1 lot of the Underlying Contract						
Unit of Trading	1 lot, as defined in Contract Size per lot						
Strike Price	A minimum of ten Strike Prices in increments of \$0.05 above and below the at-the- money Strike Price. The at-the-money strike price is the closest interval nearest to the previous day's Settlement Price of the Underlying Contract. Strike Price boundaries are adjusted according to futures price movements. User-defined Strike Prices are allowed in \$0.05 increments.						
Currency	US Dollars						
Minimum Tick	\$0.001 per MWh						
Settlement Price Precision	\$0.001 per MWh						
Last Trading Day	At 4:00 pm EPT on the 15th calendar day of the delivery month. Where the 15th calendar day is not a Business Day, the Last Trading Day shall be the first Business Day following the 15th calendar day of the delivery month						
Contract Series	Monthly contracts beginning with August in the year prior to the corresponding vintage year through September of the corresponding vintage year. The Exchange may list any other calendar month contract set off the standard listing cycle.						
Premium	The premium on the Option is paid from the buyer to the seller on the next settlement cycle following the Transaction						
Daily Settlement Price	Determined by the Exchange based on Exchange activity, other market data, and extrapolation to traded Option contracts, as appropriate						
Exercise	Exercise of In-the-Money Options is automatic on the Last Trading Day unless the Exchange is notified by 5:30 pm EPT on the Last Trading Day (1) to allow the In-the-Money Options to expire without exercise or (2) to exercise expiring Out-of-the-Money Options						
Settlement Method	Exercise into Underlying Contracts						
Position Limit	Same with underlying contracts. Option positions are weighted by Option delta and combined with Underlying Contracts position. Underlying contracts' position limits can be found at						

ITEM	SPECIFICATION					
	https://www.nodalexchange.com/files/autogenerated/Nodal_Rulebook_Appendix_ C-Limits_and_Levels.PDF					
Margin Unit	US Dollars					

Nodal Exchange, LLC Rulebook Appendix C: Reporting Levels, Accountability Levels and Position Limits

Physical Commodity Code	Contract Name	Reporting Level	Spot Month Position Limit (lots)	Single Month Accountability Level (lots)	All Month Accountability Level (lots)	Aggregation Group*	CFTC Referenced Contract
NEG	NJ-PA Dual-Qual REC Class 2 V23 Future	25	50000	50000	50000		0
NEH	NJ-PA Dual-Qual REC Class 2 V24 Future	25	50000	50000	50000		0
NEI	NJ-PA Dual-Qual REC Class 2 V25 Future	25	50000	50000	50000		0
NEJ	NJ-PA Dual-Qual REC Class 2 V26 Future	25	50000	50000	50000		0
NEK	NJ-PA Dual-Qual REC Class 2 V27 Future	25	50000	50000	50000		0
NEL	NJ-PA Dual-Qual REC Class 2 V28 Future	25	50000	50000	50000		0
NEM	NJ-PA Dual-Qual REC Class 2 V29 Future	25	50000	50000	50000		0
NEN	NJ-PA Dual-Qual REC Class 2 V30 Future	25	50000	50000	50000		0

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