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August 7, 2014

VIA EMAIL (submissions@cftc.gov)

Melissa Jurgens, Secretary Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, NW Washington, DC 20581

Re: CFTC Regulation 40.2(a) Certification: Notification of Products Offered for Trading on Nodal Exchange, LLC

Dear Ms. Jurgens:

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 power futures contracts for trading on Nodal Exchange and for submission for clearing through LCH.Clearnet Limited ("LCH") beginning on August 11, 2014. The new rules and contract specifications describing these new Exchange futures contracts are attached to this letter as Exhibit A, to be added to the Nodal Exchange Rulebook Appendix A – Contract Specifications.

Six of the new Exchange contracts are associated with three new PJM generator locations. The remaining two new Exchange contracts are associated with the ISO-NE internal hub. The on-peak and off-peak contracts for each new PJM locations settle on Day Ahead Energy + Congestion prices. The new ISO-NE contracts settle on Day Ahead Power prices.

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 contracts are 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.

Core Principle 3 - Contracts not Readily Susceptible to Manipulation: Nodal Exchange's new contracts settle to power prices published by either PJM or ISO-NE, whichever is the relevant Regional Transmission Organization ("RTO"). These PJM and ISO-NE RTO markets are regulated by the Federal Energy Regulatory Commission ("FERC") and are closely monitored by market monitors responsible to FERC. The day ahead and real time markets that generate the prices to which the Exchange contracts settle are directly related to the physical generation, and demand for, electricity as well as the physical capacity constraints of the grid. 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 Exchange is proposing position accountability levels for the new contracts because the underlying cash market is federally regulated and not readily susceptible to manipulation. The spotmonth speculative position limits for the Exchange's contracts are set at 25% of the deliverable supply in the respective underlying market. 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: www.nodalexchange.com.

<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 LCH, a derivatives clearing organization subject to Part 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 LCH 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. The Compliance Department is authorized to investigate matters involving financial surveillance.

<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 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 www.nodalexchange.com.

If you have any question or need additional information regarding the above, please contact the undersigned at 703-962-9835 or Herrera@nodalexchange.com.

Sincerely,

Anita Herrera

Chief Regulatory Officer

Attachments:

Submission Cover Sheet

Exhibit A: Addition to Nodal Exchange Appendix A - Contract Specifications **Confidential** Exhibit B: Deliverable Supply Analysis (Confidential Treatment Requested)

Exhibit C: Addition to Nodal Exchange Appendix C - Reporting Levels, Accountability Levels and Position Limits (presented in both Excel and pdf formats)



Exhibit A - Nodal Exchange Contract Specifications

PJM 21 KINCA20 KVKN-1 Monthly Day Ahead On-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Description	Monthly Cash Settled Financial On-Peak Energy + Congestion PJM 21 KINCA20 KVKN-1, Day Ahead							
Contract Code	IBW							
Hours of Trading	As defined at http://www.nodalexchange.com							
Contract Size per Lot	Variable, expressed in MWh. For each contract the lot size will equal 1 MW multiplied by the number of on-peak hours within the month traded, so in a month with 336 On-Peak hours, the lot size equals 336 MWh. The definition of On-Peak hours is Hour Ending (HE) 0800 – 2300 Monday through Friday, EPT, excluding NERC Holidays							
Unit of Trading	1 lot, as defined in Contract Size per Lot							
Currency	US Dollars							
Min Price Fluctuation	\$0.0001 per MWh							
Minimum Tick	\$0.0001 per MWh							
First Trading Day	The seventh business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 49 months before the expiration date.							
Last Trading Day	The sixth business day following the last calendar day of the month							
Contract Series	49 months							
Fixed Price	The traded price or the previous day's settlement price							
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 final settlement price will be determined by the Exchange at approximately 3 pm EPT on the Last Trading Day. The final settlement price is the average of the day-ahead hourly Energy of PJM WESTERN HUB plus the day-ahead hourly Congestion price of 21 KINCA20 KVKN-1 for all On-Peak hours in the contract month. These price files can be found at the following link or at successor location. http://www.pjm.com/pub/account/lmpda/ <yyyymmdd>-da.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	330 MW							
Margin Unit	US Dollars							

PJM 21 KINCA20 KVKN-1 Monthly Day Ahead Off-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Description	Monthly Cash Settled Financial Off-Peak Energy + Congestion PJM 21 KINCA20 KVKN-1, Day Ahead							
Contract Code	IBX							
Hours of Trading	As defined at http://www.nodalexchange.com							
Contract Size per Lot	Variable, expressed in MWh. For each contract the lot size will equal 1 MW multiplied by the number of on-peak hours within the month traded, so in a month with 400 Off-Peak hours, the lot size equals 400 MWh. The definition of Off-Peak hours is Hour Ending (HE) 0100 – 0700 and HE 2400, Monday through Friday, EPT and all hours for Saturday, Sunday, and all NERC Holidays							
Unit of Trading	1 lot, as defined in Contract Size per Lot							
Currency	US Dollars							
Min Price Fluctuation	\$0.0001 per MWh							
Minimum Tick	\$0.0001 per MWh							
First Trading Day	The seventh business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 49 months before the expiration date.							
Last Trading Day	The sixth business day following the last calendar day of the month							
Contract Series	49 months							
Fixed Price	The traded price or the previous day's settlement price							
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 final settlement price will be determined by the Exchange at approximately 3 pm EPT on the Last Trading Day. The final settlement price is the average of the day-ahead hourly Energy of PJM WESTERN HUB plus the day-ahead hourly Congestion price of 21 KINCA20 KVKN-1 for all Off-Peak hours in the contract month. These price files can be found at the following link or at successor location. http://www.pjm.com/pub/account/lmpda/ <yyyymmdd>-da.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	330 MW							
Margin Unit	US Dollars							

PJM 29 JOLIE24 KVJO-7 Monthly Day Ahead On-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Description	Monthly Cash Settled Financial On-Peak Energy + Congestion PJM 29 JOLIE24 KVJO-7, Day Ahead							
Contract Code	IBY							
Hours of Trading	As defined at http://www.nodalexchange.com							
Contract Size per Lot	Variable, expressed in MWh. For each contract the lot size will equal 1 MW multiplied by the number of on-peak hours within the month traded, so in a month with 336 On-Peak hours, the lot size equals 336 MWh. The definition of On-Peak hours is Hour Ending (HE) 0800 – 2300 Monday through Friday, EPT, excluding NERC Holidays							
Unit of Trading	1 lot, as defined in Contract Size per Lot							
Currency	US Dollars							
Min Price Fluctuation	\$0.0001 per MWh							
Minimum Tick	\$0.0001 per MWh							
First Trading Day	The seventh business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 49 months before the expiration date.							
Last Trading Day	The sixth business day following the last calendar day of the month							
Contract Series	49 months							
Fixed Price	The traded price or the previous day's settlement price							
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 final settlement price will be determined by the Exchange at approximately 3 pm EPT on the Last Trading Day. The final settlement price is the average of the day-ahead hourly Energy of PJM WESTERN HUB plus the day-ahead hourly Congestion price of 29 JOLIE24 KVJO-7 for all On-Peak hours in the contract month. These price files can be found at the following link or at successor location. http://www.pjm.com/pub/account/lmpda/ <yyyymmdd>-da.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	330 MW							
Margin Unit	US Dollars							

PJM 29 JOLIE24 KVJO-7 Monthly Day Ahead Off-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Description	Monthly Cash Settled Financial Off-Peak Energy + Congestion PJM 29 JOLIE24 KVJO-7, Day Ahead							
Contract Code	IBZ							
Hours of Trading	As defined at http://www.nodalexchange.com							
Contract Size per Lot	Variable, expressed in MWh. For each contract the lot size will equal 1 MW multiplied by the number of on-peak hours within the month traded, so in a month with 400 Off-Peak hours, the lot size equals 400 MWh. The definition of Off-Peak hours is Hour Ending (HE) 0100 – 0700 and HE 2400, Monday through Friday, EPT and all hours for Saturday, Sunday, and all NERC Holidays							
Unit of Trading	1 lot, as defined in Contract Size per Lot							
Currency	US Dollars							
Min Price Fluctuation	\$0.0001 per MWh							
Minimum Tick	\$0.0001 per MWh							
First Trading Day	The seventh business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 49 months before the expiration date.							
Last Trading Day	The sixth business day following the last calendar day of the month							
Contract Series	49 months							
Fixed Price	The traded price or the previous day's settlement price							
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 final settlement price will be determined by the Exchange at approximately 3 pm EPT on the Last Trading Day. The final settlement price is the average of the day-ahead hourly Energy of PJM WESTERN HUB plus the day-ahead hourly Congestion price of 29 JOLIE24 KVJO-7 for all Off-Peak hours in the contract month. These price files can be found at the following link or at successor location. http://www.pjm.com/pub/account/lmpda/ <yyyymmdd>-da.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	330 MW							
Margin Unit	US Dollars							

PJM 3 POWERT24 KVPO-5 Monthly Day Ahead On-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Description	Monthly Cash Settled Financial On-Peak Energy + Congestion PJM 3 POWERT24 KVPO-5, Day Ahead							
Contract Code	ICA							
Hours of Trading	As defined at http://www.nodalexchange.com							
Contract Size per Lot	Variable, expressed in MWh. For each contract the lot size will equal 1 MW multiplied by the number of on-peak hours within the month traded, so in a month with 336 On-Peak hours, the lot size equals 336 MWh. The definition of On-Peak hours is Hour Ending (HE) 0800 – 2300 Monday through Friday, EPT, excluding NERC Holidays							
Unit of Trading	l lot, as defined in Contract Size per Lot							
Currency	US Dollars							
Min Price Fluctuation	\$0.0001 per MWh							
Minimum Tick	\$0.0001 per MWh							
First Trading Day	The seventh business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 49 months before the expiration date.							
Last Trading Day	The sixth business day following the last calendar day of the month							
Contract Series	49 months							
Fixed Price	The traded price or the previous day's settlement price							
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 final settlement price will be determined by the Exchange at approximately 3 pm EPT on the Last Trading Day. The final settlement price is the average of the day-ahead hourly Energy of PJM WESTERN HUB plus the day-ahead hourly Congestion price of 3 POWERT24 KVPO-5 for all On-Peak hours in the contract month. These price files can be found at the following link or at successor location. http://www.pjm.com/pub/account/lmpda/ <yyyymmdd>-da.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	446 MW							
Margin Unit	US Dollars							

PJM 3 POWERT24 KVPO-5 Monthly Day Ahead Off-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Description	Monthly Cash Settled Financial Off-Peak Energy + Congestion PJM 3 POWERT24 KVPO-5, Day Ahead							
Contract Code	ICB							
Hours of Trading	As defined at http://www.nodalexchange.com							
Contract Size per Lot	Variable, expressed in MWh. For each contract the lot size will equal 1 MW multiplied by the number of on-peak hours within the month traded, so in a month with 400 Off-Peak hours, the lot size equals 400 MWh. The definition of Off-Peak hours is Hour Ending (HE) 0100 – 0700 and HE 2400, Monday through Friday, EPT and all hours for Saturday, Sunday, and all NERC Holidays							
Unit of Trading	1 lot, as defined in Contract Size per Lot							
Currency	US Dollars							
Min Price Fluctuation	\$0.0001 per MWh							
Minimum Tick	\$0.0001 per MWh							
First Trading Day	The seventh business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 49 months before the expiration date.							
Last Trading Day	The sixth business day following the last calendar day of the month							
Contract Series	49 months							
Fixed Price	The traded price or the previous day's settlement price							
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 final settlement price will be determined by the Exchange at approximately 3 pm EPT on the Last Trading Day. The final settlement price is the average of the day-ahead hourly Energy of PJM WESTERN HUB plus the day-ahead hourly Congestion price of 3 POWERT24 KVPO-5 for all Off-Peak hours in the contract month. These price files can be found at the following link or at successor location. http://www.pjm.com/pub/account/lmpda/ <yyyymmdd>-da.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	446 MW							
Margin Unit	US Dollars							

ISO-NE .H.INTERNAL HUB Monthly Day Ahead 7x8 Power Contract

SPECIFICATION								
Monthly Cash Settled Financial 7x8 Power, ISO-NE .H.INTERNAL HUB, Day Ahead								
ICC								
As defined at http://www.nodalexchange.com								
Variable, expressed in megawatt hour (MWh). For each contract the lot size								
will equal 1 MW multiplied by the number of 7x8 hours within the month raded, so in a month with 248 7x8 hours, the lot size equals 248 MWh. The definition of 7x8 hours is Hour Ending (HE) 0100 – 0700 and HE 2400, Sunday through Saturday, EPT								
1 lot, as defined in Contract Size per Lot								
US Dollars								
\$0.0001 per MWh								
\$0.0001 per MWh								
The fourth business day of the launch month, which corresponds to the date current expiring contract is no longer traded. The launch month is 69 mon before the expiration date.								
The third business day following the last calendar day of the month								
69 months								
The traded price or the previous day's settlement price								
Determined by the Exchange based on exchange activity, other market data, and extrapolation to traded contracts, as appropriate								
The final settlement price will be determined by the Exchange at approximately 3 pm EPT on the Last Trading Day. The final settlement price is the average of the Day Ahead hourly LMP for all 7x8 hours. These price files can be found at the following link or at successor location. http://www.iso-ne.com/histRpts/da-lmp/WW_DALMP_ISO_ <yyyymmdd>.csv</yyyymmdd>								
The first business day following the Last Trading Day								
4811 MW								
US Dollars								

ISO-NE .H.INTERNAL HUB Monthly Day Ahead 2x16 Power Contract

ITEM	CDECLEICATION								
	SPECIFICATION								
Contract	Monthly Cash Settled Financial 2x16 Power, ISO-NE .H.INTERNAL HUB, Day Ahead								
Description	ISO-NE .H.INTERNAL_HUB, Day Ahead ICD								
Contract Code									
Hours of Trading	As defined at http://www.nodalexchange.com								
Contract Size per Lot	Variable, expressed in megawatt hour (MWh). For each contract the lot size will equal 1 MW multiplied by the number of 2x16 hours within the month traded, so in a month with 144 2x16 hours, the lot size equals 144 MWh. The definition of 2x16 hours is Hour Ending (HE) 0800 – 2300, Sunday, Saturday, and all NERC holidays, EPT								
Unit of Trading	1 lot, as defined in Contract Size per Lot								
Currency	US Dollars								
Min Price Fluctuation	\$0.0001 per MWh								
Minimum Tick	\$0.0001 per MWh								
First Trading Day	The fourth business day of the launch month, which corresponds to the date current expiring contract is no longer traded. The launch month is 69 months before the expiration date.								
Last Trading Day	The third business day following the last calendar day of the month								
Contract Series	69 months								
Fixed Price	The traded price or the previous day's settlement price								
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 final settlement price will be determined by the Exchange at approximately 3 pm EPT on the Last Trading Day. The final settlement price is the average of the Day Ahead hourly LMP for all 2x16 hours. These price files can be found at the following link or at successor location. http://www.iso-ne.com/histRpts/da-lmp/WW_DALMP_ISO_ <yyyymmdd>.csv</yyyymmdd>								
Final Settlement (Payment) Date	The first business day following the Last Trading Day								
Position Limit	5695 MW								
Margin Unit	US Dollars								

Aggregation	dno							-	Ţ.
		3.960	3.960	3.960	3.960	5.352	5.352	57.732	50.340
All Month Accountability Level	(tots)						9		
Single Month Accountability	Level (Lots)	330	330	33/	33	44	44	4.811	5 605
Spot Month Position Umit	(Lots)	330	330	330	330	446	446	4811	2695
Reporting Level		25	25	25	25	25	25	25	ž,
Class		On Peak	Off Peak	On Peak	Off Peak	On Peak	Off Peak	7x8 Off Peak	2v16 DeakWF
dity		tion + Energy	tion + Energy	tion + Energy	tion + Energy	tion + Energy	tion + Energy	Power	Power
Commodity		Day Ahead Congestion + Energy	Day Ahead Congestion + Energy	Day Ahead Congestion + Energy	Day Ahead Congestion + Energy	Day Ahead Congestion + Energy	Day Ahead Congestion + Energy	Day Ahead Power	Day Ahead Power
Node Type		Generator	Generator	Generator	Generator	Generator	Generator	Main Hub	Main Hub
E									
Location		21 KINCAZD KVKN-1	21 KINCA20 KVKN-1	29 JOLIE24 KVJO-7	29 JOLIE24 KVJO-7	3 POWERT24 KVPO-5	3 POWERT24 KVPO-5	H.INTERNAL_HUB	H.INTERNAL HUS
Contract Name		ionth on dac	onth_off_dac	nth_on_dac	nth_off_dac	month on dac	month off dac	nonth_7x8_dap	nonth 2x16 dap
S		PJM PJM.21 KINCA20 KVKN-1_month_on_dac	PJM.21 KINCA20 KVKN-1_month_off_dac	PJM.29 JOLIE24 KVJO-7_month_on_dac	PJM PJM.29 JOLIE24 KVJO-7_month_off_dac	PJM.3 POWERT24 KVPO-5_month_on_dac	PJM.3 POWERT24 KVPO-5_month_off_dac	ISONEH.INTERNAL_HUB_month_7x8_dap	ISONE ISONE. H.INTERNAL HUB month 2x16 dap
Si	1	PJM P.	PJM P.	PJM P.	PJM P.	PJM P	PJM P.	SONE	SONE
Physical Commodity	Code	I8W	(BX	iBY	182	Σ	ŝ	ည	9

^{*} In addition to the individual position limit of each contract, Nodal Exchange has a separate algorithm to check the combined position limit of contracts within the same aggregation group.