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April 25, 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 18 new power futures contracts for trading on Nodal Exchange and for submission for clearing through LCH.Clearnet Limited ("LCH") beginning on April 29, 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.

The new Exchange contracts are associated with the MISO South Region, covering 3 new locations of newly defined trading hubs: Texas, Louisiana, and Arkansas. Three sets of on-peak and off-peak contracts are listed for each of these locations, settling on Day Ahead Power, Real Time Power, and Energy + Congestion prices respectively, totaling 18 contracts.

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 MISO, the relevant Regional Transmission Organization ("RTO"). These MISO 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.

Core Principle 5 - Position Limitations or Accountability: 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: <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 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 Appendix - 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)

MISO ARKANSAS.HUB Monthly Day Ahead On-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial On-Peak Power, MISO ARKANSAS.HUB, Day Ahead
Contract Code	HZA
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 On-Peak hours within the month traded, so in a month with 332 On-Peak hours, the lot size equals 332 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 fourth business day of the launch month, which corresponds to the day the 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 On-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	6346 MW
Margin Unit	US Dollars

MISO ARKANSAS.HUB Monthly Day Ahead Off-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial Off-Peak Power, MISO ARKANSAS.HUB, Day Ahead
Contract Code	HZB
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 Off-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. No hours will be added or subtracted due to Daylight Savings Time (DST) adjustments
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 day the 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 Off-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	5542 MW
Margin Unit	US Dollars

MISO ARKANSAS.HUB Monthly Real Time On-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial On-Peak Power, MISO ARKANSAS.HUB, Real Time
Contract Code	HZU
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 On-Peak hours within the month traded, so in a month with 332 On-Peak hours, the lot size equals 332 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 fourth business day of the launch month, which corresponds to the day the 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 Real Time hourly LMP for all On-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_rt_lmp_final.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	6346 MW
Margin Unit	US Dollars

MISO ARKANSAS.HUB Monthly Real Time Off-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial Off-Peak Power, MISO ARKANSAS.HUB, Real Time
Contract Code	HZV
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 Off-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. No hours will be added or subtracted due to Daylight Savings Time (DST) adjustments
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 day the 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 Real Time hourly LMP for all Off-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_rt_lmp_final.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	5542 MW
Margin Unit	US Dollars

MISO LOUISIANA.HUB Monthly Day Ahead On-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial On-Peak Power, MISO LOUISIANA.HUB, Day Ahead
Contract Code	НҮҮ
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 On-Peak hours within the month traded, so in a month with 332 On-Peak hours, the lot size equals 332 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 fourth business day of the launch month, which corresponds to the day the 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 On-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	4122 MW
Margin Unit	US Dollars

MISO LOUISIANA.HUB Monthly Day Ahead Off-Peak Power Contract

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ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial Off-Peak Power, MISO LOUISIANA.HUB, Day Ahead
Contract Code	HYZ
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 Off-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. No hours will be added or subtracted due to Daylight Savings Time (DST) adjustments
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 day the 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 Off-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	3600 MW
Margin Unit	US Dollars
Margin Unit	US Dollars

MISO LOUISIANA.HUB Monthly Real Time On-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial On-Peak Power, MISO LOUISIANA.HUB, Real Time
Contract Code	HZS
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 On-Peak hours within the month traded, so in a month with 332 On-Peak hours, the lot size equals 332 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 fourth business day of the launch month, which corresponds to the day the 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 Real Time hourly LMP for all On-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_rt_lmp_final.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	4122 MW
Margin Unit	US Dollars

MISO LOUISIANA.HUB Monthly Real Time Off-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial Off-Peak Power, MISO LOUISIANA.HUB, Real Time
Contract Code	HZT
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 Off-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. No hours will be added or subtracted due to Daylight Savings Time (DST) adjustments
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 day the 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 Real Time hourly LMP for all Off-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_rt_lmp_final.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	3600 MW
Margin Unit	US Dollars

MISO TEXAS.HUB Monthly Day Ahead On-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial On-Peak Power, MISO TEXAS.HUB, Day Ahead
Contract Code	HZC
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 On-Peak hours within the month traded, so in a month with 332 On-Peak hours, the lot size equals 332 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 fourth business day of the launch month, which corresponds to the day the 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 On-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	3473 MW
Margin Unit	US Dollars

MISO TEXAS.HUB Monthly Day Ahead Off-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial Off-Peak Power, MISO TEXAS.HUB, Day Ahead
Contract Code	HZD
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 Off-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. No hours will be added or subtracted due to Daylight Savings Time (DST) adjustments
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 day the 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 Off-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	3033 MW
Margin Unit	US Dollars

MISO TEXAS.HUB Monthly Real Time On-Peak Power Contract

MISO TEXAS.HUB Monthly Real Time Off-Peak Power Contract

ITEM	SPECIFICATION
Contract Description	Monthly Cash Settled Financial Off-Peak Power, MISO TEXAS.HUB, Real Time
Contract Code	HZX
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 Off-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. No hours will be added or subtracted due to Daylight Savings Time (DST) adjustments
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 day the 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 Real Time hourly LMP for all Off-Peak hours. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_rt_lmp_final.csv</yyyymmdd>
Final Settlement (Payment) Date	The first business day following the Last Trading Day
Position Limits	3033 MW
Margin Unit	US Dollars

MISO_RTO ARKANSAS.HUB Monthly Day Ahead On-Peak Energy + Congestion Contract

ITEM	SPECIFICATION								
Contract Code	HYG								
Contract Description	Monthly Cash Settled Financial On-Peak Energy + Congestion MISO_RTO ARKANSAS.HUB, Day Ahead								
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) 0700 – 2200 Monday through Friday, Eastern Standard Time (EST), 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 fourth business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 14 months before the expiration date.								
Last Trading Day	The third business day following the last calendar day of the month								
Contract Series	14 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 MISO_RTO INDIANA HUB plus the day-ahead hourly Congestion price of ARKANSAS.HUB for all On-Peak hours in the contract month. Energy price of MISO-RTO.INDIANA HUB is defined as its LMP minus Loss minus Congestion. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>								
Final Settlement (Payment) Date	The first business day following the Last Trading Day								
Position Limit	6346 MW								
Margin Unit	US Dollars								

MISO_RTO ARKANSAS.HUB Monthly Day Ahead Off-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Code	НҮН							
Contract Description	Monthly Cash Settled Financial Off-Peak Energy + Congestion MISO_RTO ARKANSAS.HUB, Day Ahead							
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 – 0600 and HE 2300 – 2400, Monday through Friday, EST, and all hours for Saturday, Sunday, and all NERC Holidays. No hours will be added or subtracted due to DST adjustments							
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 day the current expiring contract is no longer traded. The launch month is 14 months before the expiration date.							
Last Trading Day	The third business day following the last calendar day of the month							
Contract Series	14 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 MISO_RTO INDIANA HUB plus the day-ahead hourly Congestion price of ARKANSAS.HUB for all Off-Peak hours in the contract month. Energy price of MISO-RTO.INDIANA HUB is defined as its LMP minus Loss minus Congestion. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	5542 MW							
Margin Unit	US Dollars							

MISO_RTO LOUISIANA.HUB Monthly Day Ahead On-Peak Energy + Congestion Contract

ITEM	SPECIFICATION						
Contract Code	HYE						
Contract Description	Monthly Cash Settled Financial On-Peak Energy + Congestion MISO_RTO LOUISIANA.HUB, Day Ahead						
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) 0700 – 2200 Monday through Friday, Eastern Standard Time (EST), 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 fourth business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 14 months before the expiration date.						
Last Trading Day	The third business day following the last calendar day of the month						
Contract Series	14 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 MISO_RTO INDIANA HUB plus the day-ahead hourly Congestion price of LOUISIANA.HUB for all On-Peak hours in the contract month. Energy price of MISO-RTO.INDIANA HUB is defined as its LMP minus Loss minus Congestion. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>						
Final Settlement (Payment) Date	The first business day following the Last Trading Day						
Position Limit	4122 MW						
Margin Unit	US Dollars						

MISO_RTO LOUISIANA.HUB Monthly Day Ahead Off-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Code	HYF							
Contract Description	Monthly Cash Settled Financial Off-Peak Energy + Congestion MISO_RTO LOUISIANA.HUB, Day Ahead							
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 – 0600 and HE 2300 – 2400, Monday through Friday, EST, and all hours for Saturday, Sunday, and all NERC Holidays. No hours will be added or subtracted due to DST adjustments							
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 day the current expiring contract is no longer traded. The launch month is 14 months before the expiration date.							
Last Trading Day	The third business day following the last calendar day of the month							
Contract Series	14 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 MISO_RTO INDIANA HUB plus the day-ahead hourly Congestion price of LOUISIANA.HUB for all Off-Peak hours in the contract month. Energy price of MISO-RTO.INDIANA HUB is defined as its LMP minus Loss minus Congestion. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	3600 MW							
Margin Unit	US Dollars							

MISO RTO TEXAS.HUB Monthly Day Ahead On-Peak Energy + Congestion Contract

ITEM	SPECIFICATION							
Contract Code	HYI							
Contract Description	Monthly Cash Settled Financial On-Peak Energy + Congestion MISO_RTO TEXAS.HUB, Day Ahead							
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) 0700 – 2200 Monday through Friday, Eastern Standard Time (EST), 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 fourth business day of the launch month, which corresponds to the day current expiring contract is no longer traded. The launch month is 14 month before the expiration date.							
Last Trading Day	The third business day following the last calendar day of the month							
Contract Series	14 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 MISO_RTO INDIANA HUB plus the day-ahead hourly Congestion price of TEXAS.HUB for all On-Peak hours in the contract month. Energy price of MISO-RTO.INDIANA HUB is defined as its LMP minus Loss minus Congestion. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>							
Final Settlement (Payment) Date	The first business day following the Last Trading Day							
Position Limit	3473 MW							
Margin Unit	US Dollars							

MISO_RTO TEXAS.HUB Monthly Day Ahead Off-Peak Energy + Congestion Contract

ITEM	SPECIFICATION								
Contract Code	нүј								
Contract Description	Monthly Cash Settled Financial Off-Peak Energy + Congestion MISO_RTO TEXAS.HUB, Day Ahead								
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 – 0600 and HE 2300 – 2400, Monday through Friday, EST, and all hours for Saturday, Sunday, and all NERC Holidays. No hours will be added or subtracted due to DST adjustments								
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 fourth business day of the launch month, which corresponds to the day the current expiring contract is no longer traded. The launch month is 14 months before the expiration date.								
Last Trading Day	The third business day following the last calendar day of the month								
Contract Series	14 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 MISO_RTO INDIANA HUB plus the day-ahead hourly Congestion price of TEXAS.HUB for all Off-Peak hours in the contract month. Energy price of MISO-RTO.INDIANA HUB is defined as its LMP minus Loss minus Congestion. These price files can be found at the following link or at successor location. https://www.misoenergy.org/Library/Repository/Market Reports/ <yyyymmdd>_da_lmp.csv</yyyymmdd>								
Final Settlement (Payment) Date	The first business day following the Last Trading Day								
Position Limit	3033 MW								
Margin Unit	US Dollars								

Exhibit C: Additions to Nodal Exchange Rulebook Appendix C Reporting Levels, Accountability Levels and Position Limits

Physical Commodity Code	ISO	Contract Name	Location	Node Type	Commadity	Class	Reporting Level	Spat Month Position Limit (Lots)	Single Month Accountability Level (Lots)	All Month Accountability Level (Lots)	Aggregation Group*
HYE	MISO_RTO	MISO_RTO.LOUISIANA.HUB_month_on_dac	LOUISIANA HUB	Hub	Day Ahead Congestion + Energy	On Peak	25	4,122	4,122	49,464	254
HYF	MISO_RTO	MISO_RTO.LOUISIANA.HUB_month_off_dac	LOUISIANA HUB	Hub	Day Ahead Congestion + Energy	Off Peak	25	3,600	3,600	43,200	270
HYG	MISO_RTO	MISO_RTO.ARKANSAS.HUB_month_on_dac	ARKANSAS.HUB	Hub	Day Ahead Congestion + Energy	On Peak	25	6,346	6,346	76,152	243
HYH	MISO_RTO	MISO_RTO.ARKANSAS.HUB_month_off_dac	ARKANSAS.HUB	Hub	Day Ahead Congestion + Energy	Off Peak	25	5,542	5,542	66,504	259
HYI	MISO_RTO	MISO_RTO.TEXAS.HUB_month_on_dac	TEXAS.HUB	Hub	Day Ahead Congestion + Energy	On Peak	25	3,473	3,473	41,676	258
HYJ	MISO_RTO	MISO_RTO.TEXAS.HUB_month_off_dac	TEXAS.HUB	Hub	Day Ahead Congestion + Energy	Off Peak	25	3,033	3,033	36,396	274
HYY	MISO	MISO.LOUISIANA.HUB_month_on_dap	LOUISIANA.HUB	Hub	Day Ahead Power	On Peak	25	4,122	4,122	49,464	254
HYZ	MISO	MISO LOUISIANA HUB month_off_dap	LOUISIANA.HUB	Hub	Day Ahead Power	Off Peak	25	3,600	3,600	43,200	270
HZA	MISO	MISO.ARKANSAS.HUB_month_on_dap	ARKANSAS HUB	Hub	Day Ahead Power	On Peak	25	6,346	6,346	76,152	243
HZB	MISO	MISO ARKANSAS.HUB_month_off_dap	ARKANSAS.HUB	Hub	Day Ahead Power	Off Peak	26	5,542	5,542	66,504	259
HZC	MISO	MISO.TEXAS.HUB_month_on_dap	TEXAS.HUB	Hub	Day Ahead Power	On Peak	26	3,473	3,473	41,676	258
HZD	MISO	MISO TEXAS HUB_month_off_dap	TEXAS.HUB	Hub	Day Ahead Power	Off Peak	25	3,033	3,033	36,396	274
HZS	MISO	MISO LOUISIANA HUB_month_on_rtp	LOUISIANA HUB	Hub	Real Time Power	On Peak	25	4,122	4,122	49,464	
HZT	MISO	MISO.LOUISIANA.HUB_month_off_rtp	LOUISIANA.HUB	Hub	Real Time Power	Off Peak	26	3,600	3,600	43,200	
HZU	MISO	MISQ.ARKANSAS.HUB_month_on_rtp	ARKANSAS.HUB	Hub	Real Time Power	On Peak	25	6,346	6,346	76,152	
HZV	MISO	MISO.ARKANSAS.HUB_month_off_rtp	ARKANSAS.HUB	Hub	Real Time Power	Off Peak	25	5,542	5,542	66,504	
HZW	MISO	MISO.TEXAS.HUB_month_on_rtp	TEXAS.HUB	Hub	Real Time Power	On Peak	25	3,473	3,473	41,676	
HZX	MISO	MISO TEXAS HUB month off rlp	TEXAS.HUB	Hub	Real Time Power	Off Peak	25	3,033	3,033	36,396	

¹ 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.



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> CONFIDENTIAL TREATMENT REQUESTED

April 25, 2014

FOIA CONFIDENTIAL TREATMENT REQUEST Pursuant to 17 C.F.R. § 145.9

VIA EMAIL (FOIAsubmissions@eftc.gov)

Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20581

Re: Petition for Confidential Treatment

Dear Sir or Madam:

Nodal Exchange, LLC ("Nodal Exchange") has on this date provided the material described in Appendix A to this letter (the "Confidential Submission") to the Secretary of the Commission.

In accordance with the provisions of Commission Regulations 40.8 and 145.9, we hereby request confidential treatment of the Confidential Submission. Confidential treatment is requested on the grounds that the Confidential Submission is exempt from disclosure under paragraph (b)(4) of the FOIA and Commission Regulation 145.9(d)(1)(ii) because it contains commercial and financial information that is confidential and would be of material assistance to competitors of Nodal Exchange.

In accordance with the provisions of paragraph (d)(5) of Regulation 145.9, we request that the Confidential Submission be afforded confidential treatment in perpetuity.

We understand that if the Commission receives a FOIA request for the Confidential Submission, we will be notified of such request in accordance with the Commission's regulations and be asked to submit, within ten business days, a detailed written justification for confidential treatment of the Confidential Submission. See Commission Regulation § 145.9(e)(1); see also Executive Order 12600, 52 Fed. Reg. 23781 (June 23, 1987) (detailing pre-disclosure

Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance April 25, 2014 Page 2

notification procedures under FOIA). In such event, we request that Commission staff telephone or email the undersigned rather than rely upon United States mail for such notice.

If the Commission or its staff transmits any portion of the Confidential Submission to another federal agency, we request that you forward a copy of this letter to any such agency with the Confidential Submission and further request that you advise any such agency that Nodal Exchange has requested that this material be accorded confidential treatment.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever that are made by, or at the request of, any employee of the Commission (or any other federal agency) and which (1) incorporate, include or relate to any aspect of the Confidential Submission; or (2) refer to any conference, meeting, or telephone conversation between Nodal Exchange, its current or former employees, representatives, agents, auditors or counsel on the one hand and employees of the Commission (or any other government agency) on the other, relating to the Confidential Submission.

Any questions regarding this request for Confidential Treatment, as well as any notices pursuant to Commission Regulation § 145.9(e), should be directed to the attention of the undersigned at the addresses and telephone number provided herein. Should you receive any requests for copies of the enclosed, please contact the undersigned at 703-962-9835 or herrera@nodalexchange.com.

Very truly yours,

Anita Herrera

Chief Regulatory Officer

Encl. (Appendix A)

APPENDIX A

to April 25, 2014 Confidential Treatment Request from Nodal Exchange, LLC

The Confidential Submission referenced in the letter to which this Appendix A is attached consists of the information below required by Regulation 40.2(a)(v) regarding the submission by certification pursuant to Regulation 40.2 of futures contracts to be listed for trading by Nodal Exchange, LLC on April 29, 2014 (in addition to this Appendix A):

• Exhibit B

Deliverable Supply Analysis