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March 27, 2014

VIA EMAIL (submissions@cftc.gov)

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

Re: CFTC Regulation 40.6(a) Certification: Submission of Amendment to Rule 3.16.2 and Appendix C of the Nodal Exchange Rulebook

Dear Ms. Jurgens:

Nodal Exchange, LLC ("Nodal Exchange" or "Exchange") is notifying the Commodity Futures Trading Commission ("CFTC" or "Commission") that it is self-certifying an amendment to Rule 3.16.2 (Authorized Broker requirements) and the cover page to Appendix C of the Nodal Exchange Rulebook pursuant to Commission Regulation 40.6(a). The amended Rule 3.16.2 and the cover page to Appendix C are attached hereto, indicating the specific text that is being added for these amendments. The Exchange intends to implement the amended Rules in 10 business days on April 10, 2014.

Both amendments provide additional information that is derived from Commission Regulations. Rule 3.16.2 identifies the requirements for an Authorized Broker to submit Block Trades to the Exchange on behalf of Nodal Exchange Participants. The amendment to Rule 3.16.2 specifically adds the regulatory requirement that Authorized Brokers, whether registered as a futures commission merchant or an introducing broker, must file with the Exchange any reports the Authorized Broker is required to file with the Commission pursuant to CFTC Regulation 1.12. Appendix C identifies the reporting levels, position accountability levels and position limits for futures contracts offered on Nodal Exchange. The amendment to Appendix C is an addition to the cover page that identifies when the spot month position limits become effective for both power and natural gas contracts in accordance with Commission Regulation 150.1(a).

Exchange management has assessed the amendments to Rule 3.16.2 and Appendix C, and their compliance with applicable provisions of the Commodity Exchange Act

("Act"), including the Commissions Regulations and the Core Principles. Nodal Exchange has identified that amended Rule 3.16.2 and the cover page to Appendix C may affect the following Core Principles as follows:

Compliance with the Rules: Consistent with the Exchange's Rules, the amendments to Rule 3.16.2 and Appendix C provide additional information to ensure compliance with Exchange Rules. The amendment to Rule 3.16.2 states the requirement that all Commission registrants must file with the Exchange a copy of any reports that they are required to file with the Commission pursuant to CFTC Regulation 1.12. The amendment to Appendix C defines the spot month in accordance with Commission Regulation 150.1(a) provides clarity for compliance with position limit requirements.

<u>Core Principle 5 – Position Limitations or Accountability</u>: (Applicable to Appendix C only) Consistent with the Exchange's Rules, the amendment to Appendix C provides the Exchange's participants with the definition of the spot month for the Exchange's contracts, which thereby further reduces the potential threat of market manipulation or congestion.

Pursuant to Section 5c(c) of the Act and the Commission's Regulation 40.6, the Exchange certifies that amended Rule 3.16.2 and Appendix C comply with the Act and the Commission's Regulations thereunder. There have not been any opposing views expressed regarding the amendments to Rule 3.16.2 and Appendix C.

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 this submission, please contact me at 703-962-9835 or Herrera@nodalexchange.com.

Sincerely,

Anita Herrera

Chief Regulatory Officer

Attachments:

Submission Cover Sheet Redline of Nodal Exchange Rule 3.16.2 Redline of Nodal Exchange Rulebook Appendix C