



1921 Gallows Road, 3rd Floor
Tysons Corner, VA 22182
Phone (703) 962 9800
Fax (703) 962 9850
www.nodalexchange.com

April 18, 2016

VIA PORTAL

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

Re: CFTC Regulation 40.6(a) Certification: Submission No. 16-013 - Revisions to the Nodal Exchange Rulebook Appendices

Dear Mr. Kirkpatrick:

Nodal Exchange, LLC (“Nodal Exchange” or “Exchange”) is notifying the Commodity Futures Trading Commission (“CFTC” or “Commission”) that it is self-certifying several amendments the Appendix A (Contract Specifications) and Appendix C (Reporting Levels, Position Accountability Levels and Position Limits) of the Nodal Exchange Rulebook (collectively “Appendices”) pursuant to Commission Regulation 40.6(a). The amended Appendices are attached hereto and indicate the specific text in red that is being amended. This submission is effective immediately and the Exchange intends to implement the amended Appendices in 10 business days on May 2, 2016.

The purpose of the amendments to the Appendices is to correct and update the position limit amounts on Nodal Contracts based on five NYISO contract locations. All of these NYISO locations are generator nodes and for some of these generators, there is current and updated information that is publicly available. As explained in Exhibit B, the deliverable supply for these NYISO generator nodes were corrected and updated based on the aggregated installed capacity of all units from the same plant, i.e., nameplate capacity, which represents the amount of power that can be transmitted economically through the grid to meet load.

Exchange management has assessed the amendments to the Appendices, 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 the amendments may affect the following Core Principles as follows:

Core Principle 2 - Compliance with the Rules: Consistent with the Exchange’s Rules, these revisions to the Appendices provide accurate and current information to ensure compliance with Exchange Rules.

Christopher Kirkpatrick, Secretary
April 18, 2016
Page 2 of 2

Core Principle 3 – Contracts not Readily Susceptible to Manipulation: The description of the deliverable supply analysis for the Nodal Contracts based on the five NYISO locations is provided in attached Exhibit B, which explains and demonstrates that the Nodal Contracts are not readily susceptible to manipulation.

Core Principle 5 – Position Limitations or Accountability: The spot-month speculative position limits for the Nodal Contracts based on the five NYISO locations are set at 25% of the deliverable supply in the underlying market. The revised position limits are provided in attached Exhibit A and Exhibit C, which also includes the revised accountability levels.

Core Principle 7 - Availability of General Information: The Exchange posts the position limit and accountability levels for all Nodal Contracts in Appendix A (Contract Specifications) and Appendix C (Reporting Levels, Position Accountability Levels and Position Limits) of the Nodal Exchange Rulebook on the Exchange website: www.nodalexchange.com.

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

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,

/s/Anita Herrera
General Counsel & Chief Regulatory Officer

Attachment:

Exhibit A: Redline of Nodal Exchange Rulebook Appendix A – Contract Specifications

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

Exhibit C: Redline of Nodal Exchange Rulebook Appendix C – Reporting Levels, Accountability Levels and Position Limits (presented in both Excel and pdf formats)