



RECEIVED
C.F.T.C.

2004 NOV 30 PM 4: 10

November 30, 2004

VIA EMAIL: secretary@cftc.gov

Ms. Jean A. Webb
Secretary of the Commission
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: Certification: HedgeStreet Amending Payout Criteria for Natural Gas Fixed Payout Contracts

Dear Secretary Webb:

In accordance with Commission Regulation 40.6, HedgeStreet, Inc. ("HedgeStreet") hereby files with the Commission an amendment to the Payout Criteria of the Natural Gas Fixed Payout Hedgelets. The amendments to the Natural Gas Payout Criteria are defined in Exhibit A in accordance with Commission Regulation 40.6. The rule deletions are stricken out and the amendments or additions are underlined. HedgeStreet intends to make this amendment effective as of December 1, 2004.

No substantive opposing views were expressed to HedgeStreet with respect to these additions and amendments.

HedgeStreet hereby certifies that the Contracts and the clearing of the Contracts, including all rules defining the terms and conditions of said Contracts contained herein, complies with the Act and the Commission Regulations adopted thereunder.

Should you have any questions, please contact the undersigned at sford@hedgestreet.com or (650) 638-3511.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance



EXHIBIT A

RULE 12.22 NATURAL GAS INVENTORY CONTRACTS

(a) – (e) [unchanged]

(f) **PAYOUT CRITERION** - The two Contracts in each of the Hedgelet Pairs will have Payout Criteria which are mutually exclusive of each other, while being collectively exhaustive. The Payout Criterion for each Contract in the Hedgelet Pair will be set by HedgeStreet at the time the Hedgelet Pairs are initially issued. For the Hedgelet Pairs, the Payout Criteria of the Contracts in the Pair will be set as follows;

(i) Hedgelet Pair 1: One Contract will have a Payout Criterion of less than ~~X-5~~, X-100 and one Contract will have a Payout Criterion of greater than or equal to ~~X-5~~ X-100.

(ii) Hedgelet Pair 2: One Contract will have a Payout Criterion of greater than or equal to ~~X-5~~ X-100 and less than or equal to ~~X-2.6~~X-51, and one Contract will have a Payout Criterion of less than ~~X-5~~ X-100 or greater than ~~X-2.6~~X-51.

(iii) Hedgelet Pair 3: One Contract will have a Payout Criterion of greater than or equal to ~~X-2.5~~ X-50 and less than or equal to ~~X-0.1~~ X-1, and one Contract will have a Payout Criterion of less than ~~X-2.5~~ X-50 or greater than ~~X-0.1~~ X-1.

(iv) Hedgelet Pair 4: One Contract will have a Payout Criterion of greater than or equal to X and less than or equal to ~~X+2.5~~ X+50, and one Contract will have a Payout Criterion of less than X or greater than ~~X+2.5~~ X+50.

(v) Hedgelet Pair 5: One Contract will have a Payout Criterion of greater than or equal to ~~X+2.6~~ X+51 and less than or equal to ~~X+5~~ X+100, and one Contract will have a Payout Criterion of less than ~~X+2.6~~ X+51 or greater than ~~X+5~~ X+100.

(vi) Hedgelet Pair 6: One Contract will have a Payout Criterion of greater than ~~X+5~~ X+100, and one Contract will have a Payout Criterion of less than or equal to ~~X+5~~ X+100.