



Chicago Climate Exchange®

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August 28, 2009

Mr. David Stawick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

OFFICE OF THE SECRETARIAT
C.F.T.C.
2009 AUG 31 PM 3 02

Re: Chicago Climate Futures Exchange, LLC
Submission No. 09-22

Dear Mr. Stawick:

Chicago Climate Futures Exchange, LLC ("CCFE" or "Exchange") hereby notifies the Commodity Futures Trading Commission that it is adding an Interpretation to CCFE Rule 602. The Interpretation is attached hereto.

The Exchange certifies that this Interpretation neither violates nor is inconsistent with any portion of the Commodity Exchange Act or of the rules thereunder.

Should you require additional information regarding this submission, please contact me at 312.229.5163. Please reference our submission number 09-22 in any related correspondence.

Very truly yours,

Eric J. Nield
Senior Vice President & General Counsel

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enc.

cc: Riva Adriance
Tom Leahy
Jon Hultquist
Irina Leonova

www.chicagoclimateexchange.com

Rule 602. FICTITIOUS TRANSACTIONS – Interpretation

CCFE Rule 602 prohibits fictitious transactions. A fictitious transaction includes a prearranged trade or series of trades whereby one or more parties enters into a transaction at CCFE and reverses the transaction at CCFE or at another exchange. CCFE facilities that allow for prearranged trades (Rule 614) may not be used to facilitate a fictitious transaction as defined above.