

March 17, 2025

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 of Amendments to the Nodal Exchange Rulebook

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 amendments to the Nodal Exchange Rulebook (“Rules”) pursuant to Commission Regulation 40.6(a). The Exchange is amending Appendix A – Contract Specifications for California Carbon Allowances, Regional Greenhouse Gas Initiative, and Washington Carbon Allowances. The Exchange intends to implement the amended Rules on April 1, 2025.

The Exchange is amending Appendix A – Contract Specifications for California Carbon Allowances, Regional Greenhouse Gas Initiative, and Washington Carbon Allowances to amend the Minimum Price Fluctuation on Nodal T7 from \$0.001 to \$0.01. These revisions have no effect on the economic characteristics of the contracts in accordance with CFTC Regulation 40.6(d)(i). Specifically, the Nodal Contract Specifications are being amended for the following contracts:

Regional Greenhouse Gas Initiative Vintage 2021 – 2030
Washington Carbon Allowance Vintage 2023 - 2028
Washington Carbon Allowance Specific Vintage 2023 – 2028
California Carbon Allowance Vintage 2021 – 2030
California Carbon Allowance Specific Vintage 2021 - 2030

Exchange management has assessed the amendments to the Rules, and their compliance with applicable provisions of the 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: The amendments to the Rules provide clarity and consistency with the Act for compliance with the Rules. Appendix A is applicable to all Nodal Exchange Participants.

Core Principle 3 – Contracts Not Readily Subject to Manipulation: The applicable Futures contracts are not readily subject to manipulation and are based on established and liquid underlying cash markets. Trading of the contracts is monitored by the Exchange.

Core Principle 7 – Availability of General Information: The amendments to the Rules provide clarity to Exchange Participants. The amended Rules are available to market authorities, Participants, Authorized Brokers and the public on the Exchange website.

Core Principle 11 – Financial Integrity of Transactions: The applicable Futures contracts will continue to be cleared by Nodal Clear, a registered derivatives clearing organization subject to Commission regulation, and carried by qualified futures merchants.

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

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 703-962-9853 or Markotic@nodalexchange.com.

Sincerely,
/s/ Max Markotic
Managing Director

Attachment:

- Exhibit A: Nodal Exchange Appendix A - Contract Specifications – REDLINE