

June 19, 2025

**VIA PORTAL**

Commodity Futures Trading Commission  
Attention: Christopher Kirkpatrick, Secretary  
Three Lafayette Centre  
1155 21<sup>st</sup> 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 all Nodal District of Columbia Solar Renewable Energy Certificate contracts. The Exchange intends to implement the amended Rules on July 7, 2025.

The Exchange is amending the Contract Series to “Monthly expiry listed for Feb of one year following the vintage year” and removing all other expiries. There is no open interest on the expiries being removed and these revisions have no effect on the economic characteristics of the contracts in accordance with CFTC Regulation 40.6(d)(i).

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](http://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](mailto:Markotic@nodalexchange.com).

Sincerely,  
/s/ Max Markotic  
Managing Director

Attachment:

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