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part of eex group

August 12, 2026

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*; Rule 3.5 *Requirements for Engaging in Physical Delivery of Environmental Products;* Rule 3.6 *Additional Requirements for Engaging in Physical Delivery for California Low Carbon Fuel Standard ("LCFS"), Oregon Clean Fuels Program ("Oregon CFP"), Washington Clean Fuels Program ("Washington CFP"), and Alberta Technology Innovation and Emission Reduction ("Alberta TIER") Futures Contracts;* and *Alberta TIER Futures Contracts Post-Delivery Invalidation Procedures*. The new amended Rules are attached hereto and indicate the specific text in red that is being added. The Exchange intends to implement the amended Rules on August 26, 2026.

The Nodal Exchange Rules are being amended to establish requirements for engaging in physical delivery of Alberta TIER futures contracts, including post-delivery invalidation procedures.

Exchange management has assessed the amendments 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. Nodal Rules are applicable to all Nodal Exchange market participants.

Core Principle 4 - Prevention of Market Disruption: All activity performed on Nodal is subject to the Nodal Exchange Rulebook Section VI, which prohibits disruptive trading behavior and manipulation, subject to monitoring and surveillance by the Exchange's Division of Market Surveillance.

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

Core Principle 12 - Protection of Markets and Market Participants: Section VI of the Nodal Exchange Rulebook protects the market and market participants from abusive, disruptive, fraudulent, noncompetitive and unfair conduct and trade practices.

Core Principle 13 - Disciplinary Procedures: Section VII of the Nodal Exchange Rulebook describes the disciplinary procedures of the Exchange that authorize the Exchange to discipline, suspend, or expel anyone on the Exchange that violates these rules.

Pursuant to Section 5c(c) of the Act and the Commission's Regulation 40.6, the Exchange certifies that the 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:

Appendix A – Contract Specifications – REDLINE
Nodal Exchange Rule 3.5 and Rule 3.6 – REDLINE
Alberta TIER Futures Contracts Post-Delivery Invalidation Procedures

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