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part of eex group

October 26, 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 for WCA vs. CCA (OPIS) Spread Future, Regional Greenhouse Gas Initiative Allowance Auction Clearing Price, and Washington Carbon Allowance Advance Auction Clearing Price. The Exchange intends to implement the amended Rules on November 10, 2026.

The Exchange is amending Appendix A – Contract Specifications for WCA vs. CCA (OPIS) Spread Future to change the Last Trading Day to Three Business Days prior to the last Business Day of the expiry month.

The Exchange is amending Appendix A – Contract Specifications for Regional Greenhouse Gas Initiative Allowance Auction Clearing Price. For the Last Trading Day, the Exchange is adding *In the event that no Report is released due to the cancellation of the auction, or release of the Report is delayed beyond the extension of trading permitted by this specification, then trading shall cease at 10:00 a.m. (EPT) on the earlier of: (a) the 5th business day after the announcement of such delay or cancellation by RGGI, as announced by the Exchange; or (b) the business day prior to the Last Trading Day for the eligible RGGI futures contract.* In addition, for the Deliverable Product, the Exchange is adding *In the event that the specified auction is cancelled, or no Auction Clearing Price is published, an alternative settlement price that is equal to the higher of the applicable Minimum Reserve Price published by RGGI, and the settlement price of the eligible RGGI futures contract on the Final Settlement Day shall be determined by the Exchange.*

The Exchange is amending Appendix A – Contract Specifications for Washington Carbon Allowance Advance Auction Clearing Price to clarify that the Contract Series is Monthly expiries listed for Jun and Dec of the current year and next year ending with Dec 2027.

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:
- Nodal Exchange Appendix A - Contract Specifications – REDLINE

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