



1921 Gallows Road, 3rd Floor  
Tysons Corner, Virginia 22182  
p: 703-962-9800  
f: 703-962-9850  
[www.nodalexchange.com](http://www.nodalexchange.com)

part of eex group

February 9, 2021

**VIA CFTC PORTAL**

Commodity Futures Trading Commission  
Attention: Chris Kirkpatrick, Secretary  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**Re: Amendments to the Nodal Exchange Natural Gas Broker Incentive Program:  
Certification Submission No. 21-004 Pursuant to Regulation 40.6(a)**

Dear Mr. Kirkpatrick:

Pursuant to Commission Regulation 40.6(a), Nodal Exchange, LLC (“Nodal Exchange” or “Exchange”) is notifying the Commission by self-certification of the Exchange’s intention to amend the Nodal Exchange Natural Gas Broker Incentive Program. A complete description of the Program is included and segregated as Exhibit 1 for which the Exchange seeks confidential treatment. A redacted version is also included. This filing is effective immediately and the amended Program is scheduled to begin on March 1, 2021.

Exchange management has assessed the Program and certifies its compliance with the Commodity Exchange Act (“Act”), including the Commissions Regulations and the Core Principles. Specifically, the Program complies with Core Principle 2 (Compliance with Rules), Core Principle 4 (Prevention of Market Disruption), Core Principle 9 (Execution of Transactions), Core Principle 12 (Protection of Market Participants), and Core Principle 18 (Recordkeeping).

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

Nodal Exchange certifies that, concurrent with this submission, a redacted version of the Program was posted on the Nodal Exchange website at [www.nodalexchange.com](http://www.nodalexchange.com).

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If you have any questions 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

Director of Compliance

Attachments:

- Exhibit 1: Natural Gas Broker Incentive - CONFIDENTIAL
- Exhibit 1: Natural Gas Broker Incentive - REDACTED
- Request for Confidential Treatment