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part of eex group

May 15, 2020

**VIA Portal**

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

**Re: CFTC Regulation 40.6(a) Certification: Amendments to the Nodal Exchange Rulebook  
Appendix A and Appendix C**

Dear Mr. Kirkpatrick:

Nodal Exchange, LLC (“Nodal Exchange” or “Exchange”) is hereby providing notice to the Commodity Futures Trading Commission (“CFTC” or “Commission”) pursuant to CFTC Regulation 40.6(a) of amendments to the Nodal Exchange Rulebook Appendix A - Contract Specifications and Appendix C – Contract Reporting Levels, Position Accountability Levels and Position Limits. These amendments are to amend the name of an Environmental contract and to expand the aggregation group for 3 Environmental contracts. Appendix A and Appendix C are attached hereto and indicate the specific text in red that is being amended. This filing is effective immediately and the Exchange intends to implement the amended Rules on June 1, 2020.

Exchange management has assessed the amendments to Appendix A and Appendix C and its compliance with applicable provisions of the Commodity Exchange Act (“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: Appendix A and Appendix C are applicable to all Nodal Exchange Participants.

Core Principle 7 – Availability of General Information: Appendix A and Appendix C are posted on the Exchange website: [www.nodalexchange.com](http://www.nodalexchange.com).

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

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

Director of Compliance

Attachments:

Nodal Exchange Rulebook Appendix A - (Redline)

Nodal Exchange Rulebook Appendix C - (Redline)