



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

November 8, 2019

**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: Modifications to the Exchange Fee Schedule for Environmental Futures**

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 changes to the Exchange and Clearing Transaction Fee Schedule for Nodal Exchange Environmental Futures. This filing is effective immediately and the Exchange intends to implement the modifications to the fee schedule on November 25, 2019.

Attached hereto is the modified Fee Schedule that will be applicable to Environmental Futures. Substantive material proposed to be added to the Fee Schedules as currently in effect is underlined and material proposed to be deleted is marked in strikethrough text.<sup>1</sup>

Exchange management has assessed the Exchange and Clearing Transaction Fee Schedule for Nodal Exchange Environmental Futures 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 transaction fee schedule may affect the following Core Principles as follows:

Core Principle 2 – Compliance with the Rules: The Exchange and Clearing Transaction Fee Schedule for Nodal Exchange Environmental Futures is applicable to all Nodal Exchange Participants.

Core Principle 7 – Availability of General Information: The Exchange and Clearing Transaction Fee Schedule for Nodal Exchange Environmental Futures is 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 Exchange and Clearing Transaction Fee Schedule for Nodal Exchange Environmental Futures complies with the Act and the Commission’s Regulations thereunder. There have not been any opposing views expressed regarding the Transaction Fee Schedule.

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<sup>1</sup> Nodal Clear, LLC is submitting a separate filing to revise clearing fees for Environmental Futures. Such revisions are also reflected in the attachments.

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:

Redline of Exchange and Clearing Transaction Fee Schedule for Nodal Exchange Environmental Futures