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part of eex group

September 18, 2024

**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: Nodal Exchange Natural Gas Futures Market Maker Incentive Program 1:  
Certification Submission No. 24-036 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 Nodal Exchange Natural Gas Futures Market Maker Incentive Program 1. This plan replaces the previous Natural Gas Futures Market Maker Incentive Program 1. 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. The program will go into effect on October 2, 2024.

Exchange management has assessed the Program and certifies its compliance with the Commodity Exchange Act (“Act”), including the Commission’s 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).

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  
Managing Director

Attachments:

- Exhibit 1: Natural Gas Futures Market Maker Incentive Program 1- CONFIDENTIAL
- Exhibit 2: Natural Gas Futures Market Maker Incentive Program 1 - REDACTED
- Request for Confidential Treatment