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October 1, 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: CFTC Regulation 40.6(a) Certification: Amendments to Nodal Clear Risk Policies and Risk Management Framework**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission (“Commission” or “CFTC”) Regulation 40.6(a), Nodal Clear, LLC (“Nodal Clear” or “Clearing House”) hereby notifies the Commission that it is self-certifying amendments to the Nodal Clear Risk Policies (“Risk Policies”) and Risk Management Framework (“Risk Management Framework”). The Risk Policies and Risk Management Framework are attached hereto with indications as to the specific text that is being amended. Amendments to the Risk Policies and Risk Management Framework are to be effective on October 16, 2024.

Nodal Clear is amending its Risk Policies and Risk Management Framework to continue to enhance Nodal Clear’s risk management practices.

Nodal Clear management has assessed the amendments to the Risk Policies and Risk Management Framework and their compliance with applicable provisions of the Commodity Exchange Act (“CEA”), including the Commission’s Regulations and DCO Core Principles. Nodal Clear has identified that the amendments may have some bearing on the following Core Principles:

Core Principle B – Financial Resources: The amendments to the Risk Policies and Risk Management Framework continue to ensure Nodal Clear’s ability to discharge its financial, operational, and managerial responsibilities as a DCO.

Core Principle D – Risk Management: The amendments to the Risk Policies and Risk Management Framework continue to ensure Nodal Clear’s ability to identify and manage the risks associated with discharging the responsibilities of a DCO.

Core Principle F – Treatment of Funds: The amendments to the Risk Policies and Risk Management Framework continue to ensure that Nodal Clear invests Clearing Member and Clearing Member customer funds in instruments with minimal credit, market, and liquidity risk.

Pursuant to Section 5c(c)(1) of the CEA and the Commission’s Regulation 40.6(a), Nodal Clear certifies that the amendments to the Risk Policies and Risk Management Framework comply with the CEA and the Commission’s Regulations thereunder. Nodal Clear is not aware of any opposing views expressed regarding the amendments to the Risk Policies or Risk Management Framework. Nodal Clear certifies that this submission has been concurrently posted on the Nodal Clear website at [www.nodalclear.com](http://www.nodalclear.com).

If you have any questions or need additional information regarding this submission, please contact me at 703-962-9864 or [alvarez@nodalexchange.com](mailto:alvarez@nodalexchange.com).

Sincerely,

/s/Cody Alvarez

Cody Alvarez  
Chief Compliance Officer  
Corporate Counsel

Attachments:

- Nodal Clear Risk Policies Redline (confidential treatment requested)
- Nodal Clear Risk Management Framework Redline (confidential treatment requested)