



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

January 10, 2020

**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 the Exchange and Clearing Transaction Fee Schedules for Nodal Exchange Environmental Futures and Options**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission (“Commission” or “CFTC”) Regulation 40.6(a), Nodal Clear, LLC (“Nodal Clear”) hereby notifies the Commission that it plans to amend its clearing transaction fee schedules (“Fee Schedules”) for environmental futures and options cleared at Nodal Clear. These amendments are to establish fees and minimum block sizes for Low Carbon Fuel Standard (LCFS) credits. The Fee Schedules shall become effective on January 27, 2020. Attached hereto are the Fee Schedules that will be applicable to environmental futures and options cleared at Nodal Clear.<sup>1</sup>

Nodal Clear management has assessed the Fee Schedules 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 Fee Schedules may have some bearing on the following Core Principles:

Core Principle B - Financial Resources: The Fee Schedules will not impact Nodal Clear’s ability to discharge its financial, operational, or managerial responsibilities as a DCO.

Core Principle L - Public Information: As required by Core Principle L, Nodal Clear is publicly posting this self-certification letter on its website to ensure that market participants receive advance notice of the Fee Schedules. On the effective date of the Fee Schedules, the Fee Schedules will be posted on the Nodal Clear website.

Pursuant to Section 5c(c)(1) of the CEA and the Commission’s Regulation 40.6(a), Nodal Clear certifies that the Fee Schedules set forth in the attachment complies with the CEA and the Commission’s Regulations thereunder. Nodal Clear is not aware of any opposing views expressed regarding the Fee Schedule. 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:  
Exchange and Clearing Transaction Fee Schedules for Nodal Exchange Environmental Futures and Options(Redline)

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<sup>1</sup> Nodal Exchange, LLC is submitting a separate filing for exchange fees for environmental futures and options. Such fees are also reflected in the attachments.