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March 26, 2026

VIA CFTC PORTAL

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

Re: CFTC Regulation 40.6(a) Certification: Amendments to Nodal Clear Default Management Plan

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 Default Management Plan (“Default Management Plan”). The Default Management Plan is attached hereto with indications as to the specific text that is being amended. Amendments to the Default Management Plan are to be effective on April 9, 2026.

Nodal Clear is amending its Default Management Plan as part of Nodal Clear’s regular review and updates to the Default Management Plan.

Nodal Clear management has assessed the amendments to the Default Management Plan 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 Default Management Plan 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 Default Management Plan continue to ensure Nodal Clear’s ability to identify and manage the risks associated with discharging the responsibilities of a DCO.

Core Principle G – Default Rules & Procedures: The amendments to the Default Management Plan continue to ensure that Nodal Clear can manage Clearing Member defaults and continue to discharge its responsibilities as a DCO.

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 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 Default Management Plan. Nodal Clear certifies that this submission has been concurrently posted on the Nodal Clear website at 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.

Sincerely,

/s/Cody Alvarez
Cody Alvarez
Chief Compliance Officer
Corporate Counsel

Attachments:

Nodal Clear Default Management Plan 4-9-26 Redline - Confidential