

March 5, 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 Compliance Manual

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission (“Commission” or “CFTC”) Regulation 40.6(a), Nodal Clear, LLC (“Nodal Clear” or the “Clearing House”) hereby notifies the Commission that it is self-certifying an amendment to the Nodal Clear Compliance Manual (the “Amendments”).¹ The Amendments are attached hereto and indicate the specific text that is being amended. The Amendments shall become effective on March 19, 2026.

Nodal Clear has adopted Amendments that:

- (i) update reporting requirements;
- (ii) enhance the description of certain Nodal Clear compliance processes; and
- (iii) apply general updates throughout.

Analysis of the Amendments under DCO Core Principles

Nodal Clear management has assessed the Amendments 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 A – Compliance: Nodal Clear’s Compliance Manual complies with the Core Principles and provides for instructions on maintaining compliance with the Core Principles.

Core Principle H – Rule Enforcement: Nodal Clear will continue to maintain adequate arrangements and resources for effective monitoring and enforcement of compliance with the Nodal Clear Rules and the resolution of disputes.

Core Principle J – Reporting: The Amendments provide for updated reporting requirement that will ensure Nodal Clear

¹ Capitalized terms not defined herein have the meaning set forth in the Nodal Clear Compliance Manual.

continues to provide the Commission all required information.

Pursuant to Section 5c(c)(1) of the CEA and Commission Regulation 40.6(a), Nodal Clear certifies that the Amendments comply with the CEA and the Commission's Regulations thereunder. Nodal Clear is not aware of any opposing views expressed regarding the Amendments. 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 Compliance Manual Redline (confidential treatment requested)