nodalclear

1921 Gallows Road, 3rd Floor
Tysons Corner, Virginia 22182
p: 703-962-9800
f: 703-962-9850
www.nodalexchange.com

part of eex group

November 24, 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 Risk Policies

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"). The Risk Policies are attached hereto with indications as to the specific text that is being amended. Amendments to the Risk Policies are to be effective on December 9, 2026.

Nodal Clear is amending its Risk Policies to continue to enhance Nodal Clear's risk management practices.

Nodal Clear management has assessed the amendments to the Risk Policies 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 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 continue to ensure Nodal Clear's ability to identify and manage the risks associated with discharging the responsibilities of 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 Risk Policies. 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 Risk Policies 12-9-2026 Redline – Confidential Treatment Requested