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April 11, 2019

## **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 Rules to Revise Delivery Deadline for Environmental Contracts

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 existing Nodal Clear Rules 3.20.1 and 9.3.4 (collectively, the "Rule Amendments"). Such Rule Amendments shall become effective on April 25, 2019.

The Rule Amendments are required in order to change the delivery deadline for physically settled environmental products to 13:00 from 12:30 U.S. Eastern Prevailing Time and to capitalize defined terms. Nodal Clear management has assessed the Rule 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 Rule Amendments may have some bearing on the following Core Principles:

<u>Core Principle E - Settlement Procedures</u>: As noted above, the Rule Amendments revise the delivery deadline with respect to physically settled environmental contracts. The Nodal Clear Rules continue to clearly set out the role and liabilities of the Clearing House and Clearing Members in the physical delivery process.

<u>Core Principle L - Public Information</u>: 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 updated Nodal Clear Rules. On the effective date of the Rule Amendments, the updated Nodal Clear Rules 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 Rule Amendments comply with the CEA and the Commission's Regulations thereunder. Nodal Clear is not aware of any opposing views expressed regarding these amendments. Nodal Clear certifies that this submission has been concurrently posted on the Nodal Clear website at <a href="https://www.nodalclear.com">www.nodalclear.com</a>.

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:

Redline of Rule Amendments