



Dan Hoban
Chief Regulatory Officer
Compliance Department

September 14, 2026

VIA CFTC PORTAL

Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

RE: Amended Fee Schedule - Submission No. 26-56

Dear Mr. Kirkpatrick,

Pursuant to Commodity Futures Trading Commission ("Commission" or "CFTC") Regulation 40.6(a), Electron Exchange DCM, LLC ("Exchange" or "EXI") hereby notifies the Commission that it is amending its Exchange Execution Fees (the "Fee Schedule") for effective date October 1, 2026. The Fee Schedule document is attached as Exhibit A.

Compliance with Core Principles: The Exchange reviewed the designated contract market core principles ("DCM Core Principles") as set forth in the Commodity Exchange Act ("CEA" or the "Act") and certifies that the Fee Schedule comply with the DCM Core Principles, and in particular the following:

Core Principle 2 (Compliance with Rules): The Fee Schedule is established as a rule of the Exchange and applies uniformly to all Participants according to objective, transparent, and quantifiable qualification criteria—lifetime contracts traded and cumulative deposits. The Exchange has the operational capacity and systems to monitor Participant activity, determine the applicable Fee Tier at the close of each trading day, and apply and enforce the Fee Schedule consistently across all Participants.

Core Principle 4 (Prevention of Market Disruption): The Fee Schedule assesses a flat per-contract execution fee within each objectively determined tier and does not vary based on price, time of execution, order type, or counterparty. Because the fee structure is volume and deposit-based, non-discretionary, and applied prospectively as of the following trading day, it introduces no incentive for disruptive or manipulative trading behavior and does not impair the Exchange's ability to monitor for and prevent price distortion or disruption of the market.

Core Principle 9 (Execution of Transactions): The Fee Schedule preserves a competitive, open, and efficient market by applying identical fee terms to all Participants at each tier, with no preferential or discriminatory treatment. The lower minimums and graduated tier structure reduce the cost of accessing the Exchange's markets, thereby supporting broader participation, liquidity, and efficient price formation.

Core Principle 12 (Protection of Market Participants): The Fee Schedule is designed to benefit and protect Participants. Qualification criteria are objective and publicly disclosed, and the tier structure operates in only one direction; Execution Fees decrease, and will not increase once a Participant achieves a given Fee Tier. All fees are subject to the EXI Rulebook and EXI Legal Notices and Disclosures, publicly available at www.electronx.com/regulatory, and the Exchange applies the schedule impartially so that fees cannot be used as a vehicle for abusive, preferential, or discriminatory practices.

EXI is not aware of opposing views expressed regarding the Program. EXI further certifies that, concurrent with this filing, a copy of this submission was posted to EXI's website at <https://www.electronx.com/regulatory>.

If you require any additional information regarding this submission, please e-mail compliance@electronx.com or contact me directly via e-mail at dan@electronx.com or via phone at +1 (312) 582-9302.

Sincerely,

/s/ Dan Hoban
Chief Regulatory Officer

Attachment(s):

Exhibit A: Exchange Execution Fees