



April 27, 2026

Submitted via CFTC Portal

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

REsurety Markets LLC Certification under CFTC Regulation under 40.6(a) for Amendments to CleanTrade Schedule of Fees

Dear Mr. Kirkpatrick,

Pursuant to Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the "CFTC" or the "Commission"), REsurety Markets LLC ("REsurety Markets") hereby notifies the Commission that it has amended its Schedule of Fees, previously submitted under Exhibit K. The amended Schedule of Fees shall become effective May 11, 2026.

The fee structure is unchanged. The amendment adds a clarifying footnote to the "Fee-Paying Participant" in the VPPA Transaction Fee table. The existing designation—(i) floating price payer for greenfield facilities and (ii) fixed price payer for operational facilities—remains in place. The footnote clarifies that, prior to execution and by mutual written agreement, Participants—specifically those that have matched on the platform and are in the contracting phase of the transaction—may designate an alternative Fee-Paying Participant (i.e., the floating price payer for operational facilities or the fixed price payer for greenfield facilities), subject to prior written approval by the Chief Compliance Officer of REsurety Markets, with notice of such approval provided to both Participants.

This clarification is intended to provide additional commercial flexibility to Participants, facilitating more efficient transaction structuring while maintaining appropriate regulatory oversight. By allowing counterparties to allocate fee obligations in a manner aligned with transaction economics, the amendment supports increased participation and reduces potential friction in execution, thereby advancing REsurety Markets' objective of expanding liquidity and accessibility in the renewable energy marketplace.

A concise explanation and analysis of the amendment and its compliance with applicable provisions of the Commodity Exchange Act (the "Act"), including relevant core principles and Commission regulations, is attached hereto as Exhibit A. To assist the Commission, REsurety Markets has provided both clean and redlined versions of the amended documents. Confidential treatment is requested for both versions.

Based on the foregoing, REsurety Markets certifies that the amendment complies with the Act and CFTC regulations. REsurety Markets further certifies that it has concurrently posted this submission letter on its website and will post the amended Schedule of Fees upon its effective date at <https://resurety.com/cleantrade-regulatory-resources/>.

Please direct any questions regarding this submission to Garrett Derbyshire, Chief Compliance Officer, RESurety Markets, at gderbyshire@resurety.com.

Sincerely,

Sinéad Barry-O'Brien

Sinéad Barry-O'Brien
Chief Operating Officer
RESurety Markets, LLC

EXHIBIT A - CORE PRINCIPLE ANALYSIS

EXHIBIT A – CORE PRINCIPLE ANALYSIS

REsurety Markets has reviewed the applicable core principles for swap execution facilities set forth in Section 5h of the Act and Part 37 of the Commission’s regulations (“Core Principles”). Based on this review, REsurety Markets has determined that the amendment to its Schedule of Fees complies with all applicable Core Principles.

The amendment does not modify the underlying fee structure, but instead adds a clarifying footnote to the designation of the Fee-Paying Participant within the VPPA Transaction Fee table. Specifically, the amendment provides that Participants may, prior to execution and by mutual written agreement in accordance with Rule 306, designate the floating price payer (for operational renewable energy facilities) or the fixed price payer (for greenfield renewable energy facilities) as the Fee-Paying Participant, subject to review and prior written approval by the Chief Compliance Officer of REsurety Markets, with notice of such approval provided to both Participants.

REsurety Markets has determined that the following Core Principles are most relevant:

Core Principle 2 – Compliance with Rules and Impartial Access

The amendment is consistent with REsurety Markets’ rules, including Rule 306, and maintains compliance with impartial access requirements under Rule 316. The ability for participants to designate an alternative Fee-Paying Participant is applied on a uniform, non-discriminatory basis, subject to objective criteria, including mutual written agreement and prior approval by the Chief Compliance Officer. This ensures fair and equitable treatment of all Participants.

Core Principle 5 – Ability to Obtain Information

REsurety Markets will maintain records of any alternative Fee-Paying Participant designations, including evidence of mutual agreement and Chief Compliance Officer approval, consistent with its recordkeeping obligations under Part 37 and Rule 319.

Core Principle 12 – Conflicts of Interest

The requirement for prior review and approval by the Chief Compliance Officer, along with notice to both Participants, mitigates potential conflicts of interest and ensures transparency and consistency.

EXHIBIT B - CLEANTRADE SCHEDULE OF FEES

ATTACHED

EXHIBIT C - CLEANTRADE SCHEDULE OF FEES (REDLINE)

ATTACHED

EXHIBIT D - CONFIDENTIAL TREATMENT REQUEST

ATTACHED