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New York, NY 10055

**BY ELECTRONIC TRANSMISSION**

Submission No. 15-101  
May 11, 2015

Mr. Christopher J. Kirkpatrick  
Secretary of the Commission  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**Re: Amendments to Resolution No. 2 of Chapter 18 - Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6(a)**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission (“CFTC” or “Commission”) Regulation 40.6(a), ICE Futures U.S., Inc. (“Exchange”) hereby certifies amendments to Resolution No. 2 of Chapter 18 of the Exchange’s Rulebook, as set forth in Exhibit A.

**Amendments to Position Limits for Financial Power Futures Contracts**

The amendments to Resolution No. 2 of Chapter 18 increase position limits, single month accountability levels and all month accountability levels for eight financial power futures.

The Exchange will implement the position limit changes on May 27, 2015, effective for all expiration months, including those with open interest.

**Certifications**

The Exchange certifies that the amendments to position limits comply with the requirements of the Act and the rules and regulations promulgated thereunder. The Exchange has reviewed the designated contract market core principles (“Core Principles”) as set forth in the Act and has determined that the amendments comply with the following relevant Core Principles:

**COMPLIANCE WITH RULES**

The amended position limit levels for the eight financial power futures contracts are set forth in Resolution No.2 of Chapter 18 and will be enforced by the Exchange. In addition, trading of

these contracts is subject to all relevant Exchange rules which are enforced by the Market Regulation Department.

**CONTRACTS NOT READILY SUBJECT TO MANIPULATION**

The Exchange's financial power contracts are not readily subject to manipulation as they are based on established and liquid underlying cash markets. In addition, trading of the contracts will continue to be monitored by the Market Regulation Department.

**POSITION LIMITS OR ACCOUNTABILITY**

Positions in the eight financial power futures contracts will continue to be subject to position limits set by the Exchange. As described above, such position limits are based upon the deliverable supply in the cash market. A detailed Cash Market and Deliverable Supply Analysis is attached hereto as Exhibit B.

**FINANCIAL INTEGRITY OF CONTRACTS**

The eight financial power futures contracts will continue to be cleared by ICE Clear Europe, a registered derivatives clearing organization subject to Commission regulation, and carried by registered futures commission merchants qualified to handle customer business.

The Exchange further certifies that, concurrent with this filing, a notice of pending certification was posted on the Exchange's website as well as a copy of this submission, which may be accessed at (<https://www.theice.com/futures-us/regulation#Rule-Filings>).

If you have any questions or need further information, please contact me at 212-748-4021 or at [jason.fusco@theice.com](mailto:jason.fusco@theice.com).

Sincerely,



Jason V. Fusco  
Assistant General Counsel  
Market Regulation

Enc.  
cc: Division of Market Oversight

**EXHIBIT A**

**Resolution No. 2 – Position Limit/Accountability Table**

Rule	Contract Name	Commodity Code	Contract Size	Unit of Trading	Spot Month Limit	Single Month Accountability Level	All Month Accountability Level	Aggregate 1 (Positive Correlation)	Aggregate 2 (Negative Correlation)	Exchange Reportable Level
18.B.262	NYISO Zone G Real-Time Peak Daily Fixed Price Future	NRN	800	Mwh	900 1,481	900 1,481	900 1,481	NRN		1
18.B.143	NYISO Zone G Day-Ahead Peak Daily Fixed Price Future	GDP	800	Mwh	200 1,481	2,000 1,481	5,000	NGY		1
18.B.035	NYISO Zone G Day-Ahead Peak Fixed Price Future	NGY	800	Mwh	200 1,481	2,000 1,481	5,000	NGY		1
18.B.195	NYISO Zone G Day-Ahead Off-Peak Mini Fixed Price Future	ONG	1	MW	513 3,526	4,282 3,526	3,846	NGO		1
18.B.194	NYISO Zone G Day-Ahead Peak Mini Fixed Price Future	NMG	1	MW	476 3,526	4,762 3,526	11,905	NGY		1
18.B.179	NYISO Zone G Day-Ahead Off-Peak Daily Fixed Price Future	NOD	50	Mwh	4,000 27,505	40,000 27,505	30,000	NGO		1
18.B.093	NYISO Zone G Day-Ahead Off-Peak Fixed Price Future	NGO	50	Mwh	4,000 27,505	40,000 27,505	30,000	NGO		25
18.B.263	NYISO Zone G Real-Time Off-Peak Daily Fixed Price Future	NRQ	50	Mwh	15,900 27,505	15,900 27,505	15,900	NRQ		1

**EXHIBIT B**

**[EXHIBIT REDACTED]**