



55 East 52nd Street
New York, NY 10055

BY ELECTRONIC TRANSMISSION

Submission No. 14-9
January 31, 2013

Ms. Melissa Jurgens
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

**Re: Amendments to Resolution No. 2 of Chapter 18 –Position Limits for HED Futures
Submission Pursuant to Section 5c(e)(1) of the Act and Regulation 40.6(a)**

Dear Ms. Jurgens:

Pursuant to Commodity Futures Trading Commission (“CFTC” or “Commission”) Regulation 40.6(a), ICE Futures U.S., Inc. (“Exchange”) self certifies amendments to Resolution No. 2 of Chapter 18, which increase the spot month position limit and the single and all month accountability levels for the ERCOT Houston 345KV Real-Time Off-Peak Daily Fixed Price Future (“HED”), as set forth in Exhibit A.

The spot month position limit and the single month and all-months combined accountability levels for the HED are being increased to reflect the proper relationship to the corresponding ERCOT Houston 345KV Monthly contract, the ERCOT Houston 345KV Real-Time Off-Peak Monthly Fixed Price Future (“HEB”). This corrects the existing HED position limit and accountability levels that were erroneously set as a multiple of the ERCOT Houston Load Zone Monthly contract, the ERCOT Houston Load Zone Day-Ahead Off-Peak Fixed Price Future (“HZD”), when the Exchange recently amended the limits for certain power futures contracts, including the HED and HEB on January 14, 2014 (see ICE Futures U.S. Submission No. 2013-130).

The Exchange certifies that the amendments to Resolution No. 2 of Chapter 18, which will become effective on February 17, 2014, comply with the requirements of the CEA and the rules and regulations promulgated by the Commission thereunder. The Exchange further certifies that, concurrent with this filing, a copy of this submission was posted on the Exchange’s website and may be accessed at (<https://www.theice.com/notices/RegulatoryFilings.shtml>). The Exchange is not aware of any substantive opposing views.

If you have any questions or need further information, please contact the undersigned at 212-748-4021 or (jason.fusco@theice.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Jason V. Fusco". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

cc: Division of Market Oversight
New York Regional Office

Jason V. Fusco
Assistant General Counsel
Market Regulation

EXHIBIT A

Resolution No. 2 – Position Limit/Accountability Table

The position limit/accountability levels and reportable levels shall be applicable to Energy Contracts

* * *

Contract Name	Commodity Code	Spot Month Limit	Single Month Accountability	All Month Accountability	Aggregate 1 (Positive Correlation)
ERCOT Houston 345KV Real-Time Off-Peak Daily Fixed Price Future	HED	[18,000] 35,000	[18,000] 35,000	[30,000] 35,000	HEB
ERCOT Houston 345KV Real-Time Off-Peak Fixed Price Future	HEB	350,000	350,000	350,000	HEB
ERCOT Houston Load Zone Day-Ahead Off-Peak Fixed Price Future	HZD	180,000	180,000	280,000	HZD