



FOIA CONFIDENTIAL TREATMENT REQUESTED

April 14, 2021

VIA CFTC PORTAL

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

Re: Amendment to ICE NGX Canada Inc. Rules - Submission Pursuant to Section 5c(c)(1) of the Commodity Exchange Act and CFTC Regulation § 40.6(a)

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, (“Act”) and Commodity Futures Trading Commission (“Commission”) Regulation 40.6(a), ICE NGX Canada Inc. (“ICE NGX”) is submitting this self-certification to amend the ICE NGX Risk Management Framework (“RMF”). The RMF is a “rule” as that term is defined under Commission Regulation 40.1(j). ICE NGX intends to implement these amendments on April 30, 2021, or such later date as ICE NGX may designate.

1. Overview

ICE NGX is making this submission to implement certain changes to the ICE NGX RMF (the “Amendments”).

2. Details of Rule Changes

In addition to non-substantive and conforming changes, the Amendments:

- update the RMF to reflect practices relating to internal approval processes, confirming coverage of each Contracting Party under ICE NGX’s default insurance policy to reflect current practices;
- clarify and enhance description relating to membership requirements and collateral-related practices and processes; and
- further elaborate on the financial resources monitoring to reflect current practice.

3. Compliance with Core Principles

ICE NGX reviewed the Amendments and determined that they comply with the rules and regulations of the Commission. In this regard, ICE NGX reviewed the derivatives clearing organization (“DCO”) core principles (each a “Core Principle”) and determined that the Amendments are potentially relevant to the following Core Principles and applicable regulations of the Commission thereunder.



Compliance (Core Principle A): The Amendments are consistent with Core Principle A - Compliance and Commission Regulation 39.10, as the Amendments enhance ICE NGX's policies and procedures to reflect ICE NGX current practices for complying with Commission regulations and internal policies.

Financial Resources (Core Principle B): The Amendments are consistent with Core Principle B - Financial Resources and Commission Regulation 39.11(d), as the Amendments provide further details of ICE NGX's monitoring of financial resources.

Participant and product eligibility (Core Principle C): The Amendments are consistent with Core Principle C - Participant and product eligibility and Commission Regulation 39.12, as the Amendments reflect ICE NGX's current practices relating to membership requirements.

Risk Management (Core Principle D): The Amendments are consistent with Core Principle D - Risk Management and the following Commission Regulations:

- §39.13(f), as the Amendments reflect ICE NGX's current practices relating to limiting exposure of the clearinghouse and of other participants to potential losses from a default a particular participant; and
- §39.13(g)(9), as the Amendments reflect ICE NGX's current practices relating to certain collateral processes.

4. Certifications

ICE NGX certifies that the proposed Amendments discussed in this submission comply with the Commodity Exchange Act, including the Core Principles and the Regulations of the Commission thereunder. ICE NGX is not aware of opposing views expressed regarding these amendments. ICE NGX further certifies that, concurrent with this filing, a copy of this submission was posted to ICE NGX's website.

Yours truly,

A handwritten signature in black ink, appearing to read "Martin McGregor", is written over a horizontal line.

By: Martin McGregor
Title: General Counsel and Chief Compliance Officer
Date: April 14, 2021