



October 28, 2014

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

Re: ICE Clear Europe Self-Certification Pursuant to Commission Rule 40.6:
Amendments to Delivery Procedures for ICE Endex Belgian Natural Gas
Futures Contracts

Dear Mr. Kirkpatrick:

ICE Clear Europe Limited (“ICE Clear Europe”), a registered derivatives clearing organization under the Commodity Exchange Act, as amended (the “Act”), hereby submits to the Commodity Futures Trading Commission (the “Commission”), pursuant to Commission Rule 40.6 for self-certification, the amendments to its Delivery Procedures discussed herein. The amendments are to become effective on the business day following the tenth business day after submission, or such later date as ICE Clear Europe may determine.

Concise Explanation and Analysis

The purpose of the rule amendment is to modify the ICE Clear Europe Delivery Procedures in connection with the launch by the ICE Endex market of the ICE Endex Belgian ZTP Natural Gas Futures Contracts (the “Belgian Natural Gas Contracts”), which will be cleared by ICE Clear Europe. ICE Clear Europe does not otherwise propose to amend its clearing rules or procedures in connection with the Belgian Natural Gas Contracts.

The amendments adopt a new Part H of the Delivery Procedures, which will be applicable to the Belgian Natural Gas Contracts in the case of physical delivery. The amendments provide, among other matters, specifications for delivery of natural gas under a Belgian Natural Gas Contract through the relevant Belgian transmission system, including relevant definitions and a detailed delivery timetable for the contracts. The amendments also address invoicing and payment for delivery and

certain limitations on the liability of the Clearing House for performance or non-performance by the operator of the transmission system and provider of certain relating trading services. The amendments provide for calculation by the Clearing House of buyer's and seller's security to cover delivery obligations and related liabilities, costs or charges, as well as procedures to address failed deliveries. The procedures also outline various documentation requirements for the relevant parties.

In addition, various provisions in the Delivery Procedures have been renumbered and cross-references have been updated. Certain other typographical corrections have also been made.

Compliance with the Act and Commission Regulations

The amendments to the Delivery Procedures are potentially relevant to the following core principles: (C) Participant and Product Eligibility, (D) Risk Management and (E) Settlement Procedures, and the applicable regulations of the Commission thereunder.

- *Participant and Product Eligibility.* ICE Clear Europe has established appropriate standards for determining the eligibility of contracts submitted to the clearinghouse for clearing, consistent with the requirements of Core Principle C. ICE Clear Europe believes that its existing systems are appropriately scalable to handle the Belgian Natural Gas Contracts, which are generally similar from an operational perspective to the other ICE Endex gas futures contracts currently cleared by ICE Clear Europe.
- *Risk Management.* ICE Clear Europe believes that it will be able to manage the risks associated with acceptance of the Belgian Natural Gas Contracts for clearing (and physical delivery in such contracts), consistent with the requirements of Core Principle D. As mentioned above, the Belgian Natural Gas Contracts present a similar risk profile to other ICE Endex gas futures contracts currently cleared by ICE Clear Europe, and ICE Clear Europe believes that its existing risk management and margin framework is sufficient for purposes of risk management of the Belgian Natural Gas Contracts and related deliveries.
- *Settlement Procedures.* The amended Delivery Procedures, together with the existing ICE Clear Europe rules and settlement procedures, provide a mechanism for physical settlement of the Belgian Natural Gas Contracts. The amended Delivery Procedures, together with the Rules, establish the obligations of the clearing house in respect of delivery and permit the clearing house to manage delivery risks with respect to the Belgian Natural Gas Contracts. ICE Clear Europe believes that the amended Delivery Procedures are thus consistent with the requirements of Core Principle E and the Commission's rules thereunder.

ICE Clear Europe hereby certifies that the changes comply with the Act and the Commission's regulations thereunder.

ICE Clear Europe has received no substantive opposing views in relation to the proposed rule amendments.

ICE Clear Europe has posted a notice of pending certification and a copy of this submission on its website concurrent with the filing of this submission.
If you or your staff should have any questions or comments or require further information regarding this submission, please do not hesitate to contact the undersigned at patrick.davis@theice.com or +44 20 7065 7738, Dee Blake, Director of Regulation, at dee.blake@theice.com or +44 20 7065 7752 or Paul Swann, President & Managing Director, at paul.swann@theice.com or +44 20 7065 7700.

Very truly yours,

Patrick Davis
Head of Legal and Company Secretary