



55 East 52nd Street
New York, NY 10055

BY ELECTRONIC TRANSMISSION

Submission No. 17-60
May 16, 2017

Mr. Christopher J. Kirkpatrick
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 Position Limits and Accountability Levels for Certain Financial Power Futures Contracts
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 Certain 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 certain financial power futures. In each instance, the new levels are equivalent to those currently in effect at another designated contract market.

The Exchange will implement the position limit changes on June 1, 2017, effective for all expiration months, including those with open interest.

Certifications

The Exchange is not aware of any opposing view to the amendments and 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 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 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 existing levels for equivalent contracts set by another designated contract market.

FINANCIAL INTEGRITY OF CONTRACTS

The 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 copy of this submission was posted on the Exchange's, 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 312-836-6746 or at conor.weber@theice.com.

Sincerely,



Conor Weber
Compliance Counsel
Market Regulation

Enc.
cc: Division of Market Oversight
New York Regional Office

EXHIBIT A

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.146	PJM AEP Dayton Hub Day-Ahead Peak Daily Fixed Price Future	ADA	16	Mwh	95,000 147,651	95,000 147,651	95,000 147,651	ADB		1
18.B.039	PJM AEP Dayton Hub Day-Ahead Peak Fixed Price Future	ADB	1	MW	4,524 7,031	4,524 7,031	4,524 7,031	ADB		1
18.B.182	PJM AEP Dayton Hub Day-Ahead Off-Peak Daily Fixed Price Future	ADC	5	Mwh	290,000 509,730	290,000 509,730	290,000 509,730	ADD		1
18.B.097	PJM AEP Dayton Hub Day-Ahead Off-Peak Fixed Price Future	ADD	1	MW	3,718 6,535	3,718 6,535	3,718 6,535	ADD		1
18.B.233	MISO Arkansas Hub Day-Ahead Off-Peak Daily Fixed Price Future	MRE	50	MWh	23,096 43,228	23,096 43,228	23,096 43,228	ALO		1
18.B.207	MISO Arkansas Hub Day-Ahead Off-Peak Fixed Price Future	ALO	1	MW	2,964 5,542	2,964 5,542	2,964 5,542	ALO		1
18.B.234	MISO Arkansas Hub Day-Ahead Peak Daily Fixed Price Future	MRD	800	MWh	1,244 2,665	1,244 2,665	1,244 2,665	ALP		1
18.B.208	MISO Arkansas Hub Day-Ahead Peak Fixed Price Future	ALP	1	MW	2,964 6,346	2,964 6,346	2,964 6,346	ALP		1
18.B.183	PJM AEP Dayton Hub Real-Time Off-Peak Daily Fixed Price Future	ADO	50	Mwh	12,000 50,973	25,000 50,973	60,000	AOD		1
18.B.099	PJM AEP Dayton Hub Real-Time Off-Peak Fixed Price Future	AOD	1	MW	1,538 6,535	3,205 6,535	7,692	AOD		1
18.B.299	ERCOT North 345KV Day-Ahead Peak Daily 80 MWh Fixed Price Future	NDB	80	MWh	20,000 27,447	20,000 27,447	20,000 27,447	EVN		1
18.B.007	ERCOT North 345KV Day-Ahead Peak Fixed Price Future	EVN	1	MW	4,762 6,982	4,762 6,982	4,762 6,982	EVN		1
18.B.127	ERCOT North 345KV Hub Day-Ahead Peak Daily Fixed Price Future	NDA	16	Mwh	100,000 576,387	100,000 576,387	100,000 576,387	EVN		1
18.E.065	Option on ERCOT North 345KV Day-Ahead Peak Daily 80 MWh Fixed Price Future	NDB	80	MWh	20,000 29,324	20,000 29,324	20,000 29,324	EVN		1
18.B.307	ERCOT Houston 345KV Day-Ahead Peak Fixed Price Future	EKF	1	MW	574 4,587	1,667 4,587	2,143 4,587	HEA		1
18.B.124	ERCOT Houston 345KV Hub Day-Ahead Peak Daily Fixed Price Future	HEA	16	Mwh	12,000 91,770	35,000 91,770	45,000 91,770	HEA		1
18.B.308	ERCOT Houston 345KV Day-Ahead Off-Peak Fixed Price Future	EKI	1	MW	96 4,370	128 4,370	179 4,370	HEC		1
18.B.162	ERCOT Houston 345KV Hub Day-Ahead Off-Peak Daily Fixed Price Future	HEC	5	Mwh	7,500 80,652	10,000 80,652	14,000 80,652	HEC		1
18.B.017	ISO New England Connecticut Day-Ahead Peak Fixed Price Future	ICP	1	MW	952 1,034	2,381	3,333	ICP		1

18.B.022	ISO New England NE Massachusetts Day-Ahead Peak Fixed Price Future	INB	1	MW	476 838	2,381	3,333	INB		1
18.B.082	ISO New England NE Massachusetts Day-Ahead Off-Peak Fixed Price Future	IND	1	MW	513 656	2,564	3,205	IND		1
18.B.235	MISO Louisiana Hub Day-Ahead Off-Peak Daily Fixed Price Future	MLR	50	MWh	27,425 28,080	27,425 28,080	27,425 28,080	LFO		1
18.B.210	MISO Louisiana Hub Day-Ahead Off-Peak Fixed Price Future	LFO	1	MW	3,516 3,600	3,516 3,600	3,516 3,600	LFO		1
18.B.236	MISO Louisiana Hub Day-Ahead Peak Daily Fixed Price Future	MLQ	800	MWh	1,477 1,731	1,477 1,731	1,477 1,731	LFP		1
18.B.211	MISO Louisiana Hub Day-Ahead Peak Fixed Price Future	LFP	1	MW	3,516 4,122	3,516 4,122	3,516 4,122	LFP		1
18.B.139	MISO Indiana Hub Day-Ahead Peak Daily Fixed Price Future	MDA	800	Mwh	800 808	1,500	2,500	MCC		1
18.B.029	MISO Indiana Hub Day-Ahead Peak Fixed Price Future	MCC	1	MW	1,905 1,924	3,571	5,952	MCC		1
18.B.176	MISO Indiana Hub Day-Ahead Off-Peak Daily Fixed Price Future	MOD	50	Mwh	13,000 13,104	13,000 13,104	42,000	MCD		1
18.B.088	MISO Indiana Hub Day-Ahead Off-Peak Fixed Price Future	MCD	1	MW	1,667 1,680	1,667 1,680	5,385	MCD		1
18.E.033	Option on PJM AEP Dayton Hub Real-Time Peak Daily Look Back Fixed Price Future	DDO	800	Mwh	1,000 2,953	2,000 2,953	5,000	MSO		1
18.E.049	Option on PJM AEP Dayton Hub Real-Time Peak Fixed Price Future	MSO	1	MW	2,384 7,031	4,762 7,031	11,905	MSO		1
18.B.147	PJM AEP Dayton Hub Real-Time Peak Daily Fixed Price Future	DDP	800	Mwh	1,000 2,953	2,000 2,953	5,000	MSO		1
18.B.148	PJM AEP Dayton Hub Real-Time Peak Daily Look Back Fixed Price Future	DDO	800	Mwh	1,000 2,953	2,000 2,953	5,000	MSO		1
18.B.041	PJM AEP Dayton Hub Real-Time Peak Fixed Price Future	MSO	1	MW	2,384 7,031	4,762 7,031	11,905	MSO		1
18.B.064	ERCOT North 345KV Day-Ahead Off-Peak Fixed Price Future	NEV	1	MW	4,487 6,651	4,487 6,651	4,487 6,651	NEV		1
18.B.165	ERCOT North 345KV Hub Day-Ahead Off-Peak Daily Fixed Price Future	NDC	5	Mwh	350,000 518,778	350,000 518,778	350,000 518,778	NEV		1
18.B.187	PJM NI Hub Real-Time Off-Peak Daily Fixed Price Future	NDO	50	Mwh	40,000 40,529	49,000	78,400	NIO		1
18.B.109	PJM NI Hub Real-Time Off-Peak Fixed Price Future	NIO	1	MW	5,128 5,196	6,282	10,051	NIO		1
18.B.117	PJM Western Hub Real-Time Off-Peak Fixed Price Future	OPJ	1	MW	7,692 7,747	7,692 7,747	19,231	OPJ		1
18.E.071	Option on PJM Western Hub Real-Time Off-Peak Daily Fixed Price Future	OD8	50	Mwh	60,000 60,427	60,000 60,427	150,000	OPJ		1
18.B.191	PJM Western Hub Real-Time Off-Peak Daily Fixed Price Future	ODP	50	Mwh	60,000 60,427	60,000 60,427	150,000	OPJ		1
18.B.287	PJM PECO Zone Day-Ahead Off-Peak Daily Fixed Price Future	PFU	5	MWh	90,012 90,870	90,012 90,870	99,996	PCO		1
18.B.110	PJM PECO Zone Day-Ahead Off-Peak Fixed Price Future	PCO	1	MW	1,154 1,165	1,154 1,165	1,282	PCO		1
18.B.149	PJM Eastern Hub Day-Ahead Peak Daily Fixed Price Future	PEA	16	Mwh	200,000 215,775	200,000 215,775	200,000 215,775	PEB		1
18.B.047	PJM Eastern Hub Day-Ahead Peak Fixed Price Future	PEB	1	MW	9,524 10,275	9,524 10,275	9,524 10,275	PEB		1

18.B.247	PJM FE Ohio Day-Ahead Peak Daily Fixed Price Future	PFJ	800	MWh	672 842	672 842	672 842	PFN		1
18.B.243	PJM FE Ohio Day-Ahead Peak Fixed Price Future	PFN	1	MW	1,600 2,005	1,600 2,005	1,600 2,005	PFN		1
18.B.248	PJM FE Ohio Day-Ahead Off-Peak Daily Fixed Price Future	PFK	50	MWh	12,480 12,589	12,480 12,589	12,480 12,589	PFO		1
18.B.244	PJM FE Ohio Day-Ahead Off-Peak Fixed Price Future	PFO	1	MW	1,600 1,614	1,600 1,614	1,600 1,614	PFO		1
18.B.190	PJM Western Hub Day-Ahead Off-Peak Daily Fixed Price Future	PDO	50	Mwh	60,000 60,427	60,000 60,427	60,000 60,427	PJD		1
18.B.115	PJM Western Hub Day-Ahead Off-Peak Fixed Price Future	PJD	1	MW	7,692 7,747	7,692 7,747	7,692 7,747	PJD		1
18.B.153	PJM PEPCO Zone Day-Ahead Peak Daily Fixed Price Future	PPE	16	Mwh	20,000 21,399	35,000	45,000	PPF		1
18.B.054	PJM PEPCO Zone Day-Ahead Peak Month Fixed Price Future	PPF	1	MW	952 1,019	1,667	2,143	PPF		1
18.B.104	PJM Duquesne Zone Day-Ahead Off-Peak Fixed Price Future	PQD	1	MW	385 388	962	1,282	PQD		1
18.B.189	PJM PSEG Day-Ahead Off-Peak Daily Fixed Price Future	PSD	5	Mwh	90,000 91,104	90,000 91,104	170,000	PSB		1
18.B.114	PJM PSEG Day-Ahead Off-Peak Fixed Price Future	PSB	1	MW	1,154 1,168	1,154 1,168	2,179	PSB		1
18.B.277	PJM AECO Zone Day-Ahead Off-Peak Daily Fixed Price Future	PMF	5	MWh	19,968 22,776	35,022	45,006	PTD		1
18.B.096	PJM AECO Zone Day-Ahead Off-Peak Fixed Price Future	PTD	1	MW	256 292	449	577	PTD		1
18.B.042	PJM APS Zone Day-Ahead Peak Fixed Price Future	PUB	1	MW	1,190 1,504	2,381	3,333	PUB		1
18.B.053	PJM PENELEC Zone Day-Ahead Peak Fixed Price Future	PZB	1	MW	952 1,063	1,667	2,143	PZB		1
18.B.111	PJM PENELEC Zone Day-Ahead Off-Peak Fixed Price Future	PZD	1	MW	833 867	1,923	2,564	PZD		1
18.B.309	ERCOT South 345KV Day-Ahead Peak Fixed Price Future	EKH	1	MW	571 1,813	1,667 1,813	2,143	SEA		1
18.B.131	ERCOT South 345KV Hub Day-Ahead Peak Daily Fixed Price Future	SEA	16	Mwh	12,000 36,267	35,000 36,267	45,000	SEA		1
18.B.310	ERCOT South 345KV Day-Ahead Off-Peak Fixed Price Future	EKK	1	MW	96 1,727	48 1,727	179 1,727	SEC		1
18.B.168	ERCOT South 345KV Hub Day-Ahead Off-Peak Daily Fixed Price Future	SEC	5	Mwh	7,500 113,775	3,750 113,775	14,000 113,775	SEC		1
18.B.249	MISO Texas Hub Day-Ahead Peak Daily Fixed Price Future	MDR	800	MWh	334 1,459	334 1,459	334 1,459	TDP		1
18.B.217	MISO Texas Hub Day-Ahead Peak Fixed Price Future	TDP	1	MW	796 3,473	796 3,473	796 3,473	TDP		1
18.B.250	MISO Texas Hub Day-Ahead Off-Peak Daily Fixed Price Future	MDS	50	MWh	6,209 23,657	6,209 23,657	6,209 23,657	TDQ		1
18.B.216	MISO Texas Hub Day-Ahead Off-Peak Fixed Price Future	TDQ	1	MW	796 3,033	796 3,033	796 3,033	TDQ		1
18.B.218	MISO Texas Hub Real-Time Off-Peak Fixed Price Future	TPO	1	MW	796 3,033	796 3,033	796 3,033	TPO		1
18.B.219	MISO Texas Hub Real-Time Peak Fixed Price Future	TPP	1	MW	796 3,473	796 3,473	796 3,473	TPP		1
18.B.311	ERCOT West 345KV Day-Ahead Peak Fixed Price Future	EKG	1	MW	571 1,105	1,667	2,143	WEA		1
18.B.134	ERCOT West 345KV Hub Day-Ahead Peak Daily Fixed Price Future	WEA	16	Mwh	12,000 22,092	35,000	45,000	WEA		1
18.B.074	ERCOT West 345KV Real-Time Off-Peak Fixed Price Future	WEB	1	MW	1,026 1,052	1,282	1,923	WEB		1

18.B.172	ERCOT West 345KV Real-Time Off-Peak Daily Fixed Price Future	WED	50	Mwh	8,000 8,206	10,000	15,000	WEB		1
18.B.312	ERCOT West 345KV Day-Ahead Off-Peak Fixed Price Future	EKJ	1	MW	96 1,052	64 1,052	179 1,052	WEC		1
18.B.171	ERCOT West 345KV Hub Day-Ahead Off-Peak Daily Fixed Price Future	WEC	5	Mwh	7,500 45,942	5,000 45,942	14,000 45,942	WEC		1
18.B.091	NYISO Zone C Day-Ahead Off-Peak Fixed Price Future	ZCD	1	MW	577 589	962	1,282	ZCD		1
18.B.200	NYISO Zone F Day-Ahead LBMP Peak Daily Fixed Price Future	NFP	800	MWh	200 217	1,000	1,400	ZFB		1
18.B.034	NYISO Zone F Day-Ahead Peak Fixed Price Future	ZFB	1	MW	476 516	2,381	3,333	ZFB		1