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BY ELECTRONIC TRANSMISSION

Submission No. 17-98

June 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(e)(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 and single month accountability levels for the two financial power futures contracts listed below:

- PJM Western Hub Real-Time Off-Peak Calendar Year One Time Fixed Price Future (“PWC”)
- Calendar One Time Option on PJM Western Hub Real-Time Off-Peak Calendar Year One Time Fixed Price Future (“PWC”)

In both instances, the new levels are equivalent to those currently in effect at the Exchange for materially similar contracts. Specifically, the amendments align the PWC position limits with the position limits for the contracts into which they aggregate—the PJM Western Hub Real-Time Off-Peak Fixed Price Future (“OPF”) and the corresponding option. The Exchange will implement the position limit changes on July 3, 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 currently in effect at the Exchange.

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	Trading Ratio
18.B.116	PJM Western Hub Real-Time Off-Peak Calendar Year One Time Fixed Price Future	PWC	1	MW	7,692 7,747	7,692 7,747	19,231	OPJ		1	1 PWC : 1 OPJ
18.B.117	PJM Western Hub Real-Time Off-Peak Fixed Price Future	OPJ	1	MW	7,747	7,747	19,231	OPJ		1	1 OPJ : 1 OPJ
18.E.037	Calendar One Time Option on PJM Western Hub Real-Time Off-Peak Calendar Year One Time Fixed Price Future	PWC	1	MW	7,692 7,747	7,692 7,747	19,231	OPJ		1	1 PWC : 1 OPJ
18.E.027	Option on PJM Western Hub Real-Time Off-Peak Fixed Price Future	OPJ	1	MW	7,747	7,747	19,231	OPJ		1	1 OPJ : 1 OPJ