



FOIA CONFIDENTIAL TREATMENT REQUESTED

February 16, 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 March 3, 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.

2. Details of Rule Changes

ICE NGX is making certain changes to its RMF to:

- introduce additional analyses on ICE NGX’s Initial Margin Rate model (IMR), including enhancing existing product level micro back-testing, conducting quarterly IMR materiality check, and performing an annual calibration study; and
- enhance documentation relating to ICE NGX’s Portfolio Margining Model (PMM) and IMR. collectively, the “RMF Amendments”.

ICE NGX has respectfully requested confidential treatment for the RMF Amendments which were submitted concurrently with this submission.

3. Compliance with Core Principles

ICE NGX reviewed the RMF 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 RMF Amendments are potentially relevant to the following core principles and applicable regulations of the Commission thereunder.



Compliance (Core Principle A): The RMF Amendments are consistent with Core Principle A - Compliance and Commission Regulation 39.10, as the RMF Amendments enhance ICE NGX's policies and procedures relating PMM and IMR.

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

- §39.13(g)(2), as the RMF Amendments strengthen ICE NGX's initial margin methodology and coverage; and
- §39.13(g)(7), as the RMF Amendments strengthen ICE NGX's back-testing procedures.

4. Certifications

ICE NGX certifies that the proposed RMF 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 'Greg Abbott', is written over a horizontal line.

Greg Abbott (Feb 18, 2021 16:46 MST)

By: Greg Abbott
Title: President & COO
Date: February 16, 2021