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New York, NY 10055

BY ELECTRONIC TRANSMISSION

Submission No. 15-167

October 13, 2015

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 Rule 18.05
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6(a)

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”) and Commission Regulation 40.6(a), ICE Futures U.S., Inc. (“Exchange”) hereby certifies an amendment deleting Exchange Rule 18.05(d), which is being made to clarify Clearing Members’ obligations to report open interest after the Exchange’s last trading day for Energy Contracts.

Certain Energy Contracts remain open for days or weeks after the Exchange’s last trading day, and settlements and adjustments can be made with respect to those positions at ICE Clear Europe during such period. As such, the Exchange and reporting FCMs are required to report these positions to the Commission until the final settlement date at ICE Clear Europe (“ICEU”). Exchange Rule 18.05(d), which tries to track that obligation, provides that the Exchange may request Clearing Members to report open interests on the “Last Trading Day” for an expiring Energy Contract and allows for positions to be adjusted after the close of trading on Last Trading Day. The reference to “Last Trading Day” in the paragraph has left room for ambiguity as to when the reporting obligation ends.

The Exchange is deleting Rule 18.05(d) to eliminate the ambiguity and because the provision is unnecessary as paragraphs (a) through (c) of the rule already set forth all of the necessary open interest reporting requirements. Specifically, the requirements addressed in Rule 18.05(d) are also covered by Rule 18.05(a), which includes the obligation for Clearing Members to report open interest on each and every Exchange Business Day for the purpose of the Exchange publishing open interest for all outstanding Energy Contracts.

The Exchange certifies that the amendments to Rule 18.05, which will become effective on October 27, 2015, comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. The Exchange further certifies that, concurrent with this filing, a copy of this submission was posted on the Exchange's website and may be accessed at (<https://www.theice.com/futures-us/regulation#Rule-Filings>). The Exchange is not aware of any substantive opposing views expressed with respect to this filing.

If you have any questions or need further information, please contact me at 212-748-4021 or at jason.fusco@theice.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason V. Fusco". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jason V. Fusco
Assistant General Counsel
Market Regulation

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

EXHIBIT A

(In the text of the amendments below, additions are underlined and deletions are bracketed and lined out.)

18.05. Open Interest in Energy Contracts

(a) Each Clearing Member shall report its open interest in Energy Contracts (separately by proprietary and Customer account) to the Clearing Organization by the close of business (or such other time as the Clearing Organization may specify) on each Exchange Business Day. On each Exchange Business Day, each Clearing Member shall report to the Clearing Organization by the time specified by the Exchange or the Clearing Organization, any adjustments to be made in the open interest reported on the previous Business Day. The open interest so reported and adjusted shall be used by the Exchange for the purpose of publishing the open interest in all outstanding Energy Contracts.

(b) If the account of any Customer carried by a Clearing Member (other than on an omnibus basis) has a long and short position in the same Contract Period, the Clearing Member must determine, in accordance with applicable law, whether such positions should be reported on a net basis or a gross basis. If the account of any Customer carried by a Clearing Member (other than on an omnibus basis) or if any proprietary account of a Clearing Member has a long and short position in the same Contract Period in Commodity Contracts which are identical except for the size of the unit of trading and which are identified by the Clearing Organization as fungible, the Clearing Member may cause the positions to be offset and report as open interest only the net position of such customer or proprietary account for the Commodity Contract in which a position remains.

(c) If a Clearing Member discovers an error in any report made pursuant to this Rule 18.05, such Clearing Member shall as soon as practicable submit to the Clearing Organization and the Exchange a correction and a written statement as to how the error occurred.

~~(d) On the Last Trading Day of an expiring Contract Period, the Exchange may request Clearing Members to report open interest so that the Exchange can publish an indicative open interest figure based on the open interest held by Clearing Members as of the time specified by the Exchange in its request for open position information. In such case, after the close of trading on the Last Trading Day, Clearing Members will be permitted to perform settlements and position adjustments with respect to the positions so reported by them to the Exchange, until such cut off time as the Exchange shall establish. Clearing Members shall ensure that positions in such expiring Contract Period for which open interest may not be reported on a gross basis are settled on the Last Trading Day prior to such time as the Exchange may specify.~~

(d [e]) Positions which have been reported on a net basis may not be re-opened other than by trading, unless authorized by the Exchange in writing.