

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 25-015

Organization: New York Mercantile Exchange, Inc. ("NYMEX")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 01/07/25 Filing Description: Initial Listing of Platinum Weekly Friday Option and Palladium Weekly Friday Option Contracts

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- Certification § 40.6(a)
- Approval § 40.5(a)
- Notification § 40.6(d)
- Advance Notice of SIDCO Rule Change § 40.10(a)
- SIDCO Emergency Rule Change § 40.10(h)

Rule Numbers:

New Product

Please note only ONE product per Submission.

- Certification § 40.2(a)
- Certification Security Futures § 41.23(a)
- Certification Swap Class § 40.2(d)
- Approval § 40.3(a)
- Approval Security Futures § 41.23(b)
- Novel Derivative Product Notification § 40.12(a)
- Swap Submission § 39.5

Official Product Name: See filing.

Product Terms and Conditions (product related Rules and Rule Amendments)

- Certification § 40.6(a)
- Certification Made Available to Trade Determination § 40.6(a)
- Certification Security Futures § 41.24(a)
- Delisting (No Open Interest) § 40.6(a)
- Approval § 40.5(a)
- Approval Made Available to Trade Determination § 40.5(a)
- Approval Security Futures § 41.24(c)
- Approval Amendments to enumerated agricultural products § 40.4(a), § 40.5(a)
- "Non-Material Agricultural Rule Change" § 40.4(b)(5)
- Notification § 40.6(d)

Official Name(s) of Product(s) Affected:

Rule Numbers:

January 7, 2025

VIA ELECTRONIC PORTAL

Mr. Christopher J. Kirkpatrick
 Office of the Secretariat
 Commodity Futures Trading Commission
 Three Lafayette Centre
 1155 21st Street, N.W.
 Washington, D.C. 20581

Re: CFTC Regulation 40.2(a) Certification. Initial Listing of Platinum Weekly Friday Option and Palladium Weekly Friday Option Contracts. NYMEX Submission No. 25-015

Dear Mr. Kirkpatrick:

New York Mercantile Exchange, Inc. (“NYMEX” or “Exchange”) is certifying to the Commodity Futures Trading Commission (“CFTC” or “Commission”) the initial listing of Platinum Weekly Friday Option and Palladium Weekly Friday Option contracts (the “Contracts”) for trading on the CME Globex electronic trading platform (“CME Globex”) and for submission for clearing via CME ClearPort, effective Sunday, February 2, 2025, for trade date Monday, February 3, 2025 as noted in the table below.

Contract Title	Platinum Weekly Friday Option	Palladium Weekly Friday Option
CME Globex / CME ClearPort Code	P1L-P5L	PE1-PE5
Rulebook Chapter	361 – Platinum Weekly Option	145 – Palladium Weekly Option
Settlement Type	Physical - Exercise into Futures	
Underlying Futures Contract/Commodity Codes	Platinum Futures (PL)	Palladium Futures (PA)
Contract Size	50 troy ounces	100 troy ounces
Price Quotation	U.S. dollars and cents per troy ounce	
Minimum Price Fluctuation	\$0.10	\$0.10
Value per Tick	\$5.00	\$10.00
Termination of Trading	Trading terminates at the settlement time of the underlying futures on Friday of the contract week	
Listing Schedule	Weekly contracts listed for 4 weeks. No weekly contract listed if the same expiration as the monthly option. No weekly contract if the expiration day is not a business day.	
Initial Listing	P1L-P4L	PE1-PE4
Block Trade Minimum Threshold / Reporting Window	10 contracts / subject to a 15-minute reporting window	
CME Globex Matching Algorithm	FIFO - 100%	

Strike Price Listing Schedule	Minimum 30 strikes above and below the at-the-money strike at \$5.00 per troy ounce increment then 4 strikes above and below the highest and the lowest \$5.00 increment strikes at \$25.00 per troy ounce increment. Dynamic strikes above and below the highest and lowest pre-listed strikes at \$5.00 per troy ounce increment.	Minimum 40 strikes above and below the at-the-money strike at \$5.00 per troy ounce increment then 6 strikes above and below the highest and the lowest \$5.00 increment strikes at \$25.00 per troy ounce increment. Dynamic strikes above and below the highest and lowest pre-listed strikes at \$5.00 per troy ounce increment.
Exercise Style	American	
Trading and Clearing Hours	CME Globex Pre-open: Sunday 4:00 p.m. - 5:00 p.m. Central Time/CT; Monday – Thursday 4:45 p.m. - 5:00 p.m. CT CME Globex: Sunday 5:00 p.m. - Friday 4:00 p.m. CT with a daily maintenance period from 4:00 p.m. - 5:00 p.m. CT CME ClearPort: Sunday 5:00 p.m. - Friday 4:00 p.m. CT with no reporting Monday - Thursday from 4:00 p.m. - 5:00 p.m. CT	

The new Platinum Weekly Friday Option and Palladium Weekly Friday Option contracts are referenced contracts that exercise into the core referenced Platinum Futures (Commodity Code: PL; Rulebook Chapter: 105) and Palladium Futures (Commodity Code: PA; Rulebook Chapter 106), respectively. These new weekly option contracts expire prior to the spot month limits taking effect for the corresponding core referenced futures contract.

The Exchange reviewed the designated contracts market core principles (“Core Principles”) as set forth in the Commodity Exchange Act (“CEA” or “Act”) and identified that the Contracts may have some bearing on the following Core Principles:

- **Compliance with Rules:** Trading in the Contracts will be subject to the rules in NYMEX Rulebook Chapter 4 which includes prohibitions against fraudulent, noncompetitive, unfair and abusive practices. Additionally, trading in these contracts will also be subject to the full panoply of trade practice rules, the majority of which are contained in Chapter 5 of the Rulebook. As with all products listed for trading on one of CME Group’s designated contract markets, activity in these new products will be subject to extensive monitoring and surveillance by CME Group’s Market Regulation Department. The Market Regulation Department has the authority to exercise its investigatory and enforcement power where potential rule violations are identified.
- **Contracts Not Readily Subject to Manipulation:** The Contracts are not readily susceptible to manipulation and are based on the deep liquidity of the underlying futures contracts.
- **Prevention of Market Disruption:** Trading in the Contracts will be subject to the NYMEX Rulebook which include prohibitions on manipulation, price distortion and disruptions of the delivery or cash-settlement process. As with all products listed for trading on one of CME Group’s designated contract markets, activity in the new products will be subject to extensive monitoring and surveillance by CME Group’s Market Regulation Department.
- **Position Limitations or Accountability:** The speculative position limits for the Contracts as demonstrated in this submission are consistent with the Commission’s guidance.

- **Availability of General Information:** The Exchange will publish on its website information regarding contract specifications, terms and conditions, as well as daily trading volume, open interest and price information for the Contracts.
- **Daily Publication of Trading Information:** The Exchange will publish information contract trading volumes, open interest levels, and price information daily on its website and through quote vendors for the Contracts.
- **Execution of Transactions:** The Contracts will be listed for trading on the CME Globex electronic trading and for clearing through CME ClearPort. The CME Globex trading venue provides for competitive and open execution of transactions. CME Globex affords the benefits of reliability and global connectivity.
- **Trade Information:** All required trade information for the Contracts will be included in the audit trail and is sufficient for the Market Regulation Department to monitor for market abuse.
- **Financial Integrity of Contract:** The Contracts will be cleared by the CME Clearing House which is a registered derivatives clearing organization with the Commission and is subject to all Commission regulations related thereto.
- **Protection of Market Participants:** NYMEX Rulebook Chapters 4 and 5 contain multiple prohibitions precluding intermediaries from disadvantaging their customers. These rules apply to trading on all of the Exchange's competitive trading venues and will be applicable to transactions in these Contracts.
- **Disciplinary Procedures:** Chapter 4 of the Rulebook contains provisions that allow the Exchange to discipline, suspend or expel members or market participants that violate the rules. Trading in these Contracts will be subject to Chapter 4, and the Market Regulation Department has the authority to exercise its enforcement power in the event rule violations in these Contracts are identified.
- **Dispute Resolution:** Disputes with respect to trading in the Contracts will be subject to the arbitration provisions set forth in Chapter 6 of the Rulebook. The rules in Chapter 6 allow all non-members to submit a claim for financial losses resulting from transactions on the Exchange to arbitration. A member named as a respondent in a claim submitted by a non-member is required to participate in the arbitration pursuant to the rules in Chapter 6. Additionally, the Exchange requires that members resolve all disputes concerning transactions on the Exchange via arbitration.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.2(a), the Exchange hereby certifies that the Contracts comply with the Act, including regulations under the Act. There were no substantive opposing views to the proposal.

The Exchange certifies that this submission has been concurrently posted on the CME Group website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at (312) 466-7478 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Timothy Elliott
Managing Director and Chief Regulatory Counsel

Attachments:	Exhibit A	NYMEX Rulebook Chapters 361 and 145
	Exhibit B	Exchange Fees
	Exhibit C	Position Limit, Position Accountability, and Reportable Level Table in Chapter 5 of the NYMEX Rulebook (attached under separate cover)
	Exhibit D	NYMEX Rule 588.H. – (“Globex Non-Reviewable Trading Ranges”) Table
	Exhibit E	NYMEX Rule 589. – Special Price Fluctuation Limits and Daily Price Limits Table
	Exhibit F	NYMEX Rulebook Chapter 300 - Strike Price Listing and Exercise Procedures Table
	Exhibit G	Analysis of Deliverable Supply

Exhibit A

NYMEX Rulebook

Chapter 361

Platinum Weekly Option

361100. SCOPE OF CHAPTER

This chapter is limited in application to weekly put and call options on the Platinum Futures contract. In addition to the Rules of this chapter, transactions in the Platinum Weekly Friday Option contracts shall be subject to the general Rules of the Exchange insofar as applicable.

361101. OPTION CHARACTERISTICS

The number of weeks open for trading at a given time shall be determined by the Exchange.

361101.A. Trading Schedule

The hours of trading for these contracts shall be determined by the Exchange.

361101.B. Trading Unit

A Platinum Weekly call option traded on the Exchange represents an option to assume a long position in the closest to expiry of a non-spot January, April, July, or October Platinum Futures contract, unless such expiration day is after the expiry of the associated monthly option for those months. In such case, the contract will be exercisable into a future in the second closest to expiry January, April, July, or October Platinum Futures contract.

A Platinum Weekly put option traded on the Exchange represents an option to assume a short position in the closest to expiry of a non-spot January, April, July, or October Platinum Futures contract, unless such expiration day is after the expiry of the associated monthly option for those months. In such case, the contract will be exercisable into a future in the second closest to expiry January, April, July, or October Platinum Futures contract.

361101.C. Price Increments

Prices shall be quoted in dollars and cents per ounce. The minimum price increment will be \$0.10 per troy ounce.

361101.D. Position Limits, Exemptions, Position Accountability and Reportable Levels

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

361101.E. Termination of Trading

Platinum Weekly Friday Option

Options will expire at the settlement time of the underlying futures on a Friday schedule. If such Friday is an Exchange holiday, the weekly option will not be listed for trading.

361101.F. Type Option

The option is an American-style option which can be exercised on any Business Day prior to and until expiration day.

361101.G. Special Price Fluctuation Limits

At the commencement of each trading day, the contract shall be subject to special fluctuation limits as set forth in Rule 589 and in the Special Price Fluctuation Limits and Daily Limits Table in the Interpretations & Special Notices Section of Chapter 5.

361102. EXERCISE PRICES AND CHARACTERISTICS

Transactions shall be conducted for option contracts as set forth in Rule 300.20.

Chapter 145 Palladium Weekly Option

145100. SCOPE OF CHAPTER

This chapter is limited in application to weekly put and call options on the Palladium Futures contract. In addition to the Rules of this chapter, transactions in the Palladium Weekly Friday Option contracts shall be subject to the general Rules of the Exchange insofar as applicable.

145101. OPTION CHARACTERISTICS

The number of weeks open for trading at a given time shall be determined by the Exchange.

145101.A. Trading Schedule

The hours of trading for these contracts shall be determined by the Exchange.

145101.B. Trading Unit

A Palladium Weekly call option traded on the Exchange represents an option to assume a long position in the closest to expiry of a non-spot March, June, September, or December Palladium Futures contract, unless such expiration day is after the expiry of the associated monthly option for those months. In such case, the contract will be exercisable into a future in the second closest to expiry March, June, September, or December Palladium Futures contract.

A Palladium Weekly put option traded on the Exchange represents an option to assume a short position in the closest to expiry of a non-spot March, June, September, or December Palladium Futures contract, unless such expiration day is after the expiry of the associated monthly option for those months. In such case, the contract will be exercisable into a future in the second closest to expiry March, June, September, or December Palladium Futures contract.

145101.C. Price Increments

Prices shall be quoted in dollars and cents per ounce. The minimum price increment will be \$0.10 per troy ounce.

145101.D. Position Limits, Exemptions, Position Accountability and Reportable Levels

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

145101.E. Termination of Trading

Palladium Weekly Friday Option

Options will expire at the settlement time of the underlying futures on a Friday schedule. If such Friday is an Exchange holiday, the weekly option will not be listed for trading.

145101.F. Type Option

The option is an American-style option which can be exercised on any Business Day prior to and until expiration day.

145101.G. Special Price Fluctuation Limits

At the commencement of each trading day, the contract shall be subject to special fluctuation limits as set forth in Rule 589 and in the Special Price Fluctuation Limits and Daily Limits Table in the Interpretations & Special Notices Section of Chapter 5.

145102. EXERCISE PRICES AND CHARACTERISTICS

Transactions shall be conducted for option contracts as set forth in Rule 300.20.

Exhibit B
Exchange Fees

Exchange Fees	Member	Non-Member
CME Globex	\$0.80	\$1.65
Block	\$0.85	\$1.70
EFR/EOO	\$3.35	\$4.00
Processing Fees	Member	Non-Member
Option Exercise/Assignment Notice	\$0.85	
Facilitation Fee	\$0.85	
Give-Up Surcharge	\$0.05	
Position Adjustment/Position Transfer	\$0.10	

Exhibit C
NYMEX Rulebook
Chapter 5
(“Trading Qualifications and Practices”)
Position Limit, Position Accountability, and Reportable Level Table
(attached under separate cover)

Exhibit D
NYMEX Rulebook
Chapter 5
(“Trading Qualifications and Practices”)
Rule 588.H. (“Globex Non-Reviewable Trading Ranges”) Table
(additions underscored)

Instrument	Globex Symbol	Outrights		
		Globex Non-Reviewable Ranges (NRR)	NRR: Globex Format	NRR: Minimum Ticks
<u>Platinum Weekly Friday Option</u>	<u>P1L, P2L, P3L, P4L, P5L</u>	<u>The greater of the following:</u> •Delta multiplied by the underlying futures non-reviewable range •20% of premium up to ¼ of the underlying futures non-reviewable range •5 ticks		
<u>Palladium Weekly Friday Option</u>	<u>PE1, PE2, PE3, PE4, PE5</u>	<u>The greater of the following:</u> •Delta multiplied by the underlying futures non-reviewable range •20% of premium up to ¼ of the underlying futures non-reviewable range •5 ticks		

Exhibit E
NYMEX Rulebook
Chapter 5
(“Trading Qualifications and Practices”)
Rule 589. Special Price Fluctuation Limits and Daily Price Limits Table
(additions underscored)

Product	Rulebook Chapter	Commodity Code	PRIMARY/ASSOCIATED	ASSOCIATED WITH	Dynamically Calculated Variant	Daily Price Limit
<u>Platinum Weekly Friday Option</u>	<u>361</u>	<u>P1L, P2L, P3L, P4L, P5L</u>	<u>Associated</u>	<u>PL</u>		
<u>Palladium Weekly Friday Option</u>	<u>145</u>	<u>PE1, PE2, PE3, PE4, PE5</u>	<u>Associated</u>	<u>PA</u>		

Exhibit F
NYMEX Rulebook
Chapter 300
(“Option Contracts”)
Strike Price Listing and Exercise Procedure Table

Commodity Code	CME Globex Code	Product Name	Product Group	Product Subgroup	Exchange	Rulebook Chapter	Strike Price Listing Rule	Option Style	Contrary Instructions	Margin Style	Exact At-The-Money Characteristics	Underlying Commodity Code	Underlying Product Name
PE1-PE5	PE1-PE5	Palladium Weekly Friday Option	Metals	Precious	NYMEX	145	Minimum 40 strikes above and below the at-the-money strike at \$5.00 per troy ounce increment then 6 strikes above and below the highest and the lowest \$5.00 increment strikes at \$25.00 per troy ounce increment. Dynamic strikes above and below the highest and lowest pre-listed strikes at \$5.00 per troy ounce increment.	American	No	Equity	Exercise Calls. Abandon Puts.	PA	Palladium Futures
P1L-P5L	P1L-P5L	Platinum Weekly Friday Option	Metals	Precious	NYMEX	361	Minimum 30 strikes above and below the at-the-money strike at \$5.00 per troy ounce increment then 4 strikes above and below the highest and the lowest \$5.00 increment strikes at \$25.00 per troy ounce increment. Dynamic strikes above and below the highest and lowest pre-listed strikes at \$5.00 per troy ounce increment.	American	No	Equity	Exercise Calls. Abandon Puts.	PL	Platinum Futures

Exhibit G

Deliverable Supply Analysis

Appendix C to part 38 of the Commission's regulations defines deliverable supply as "the quantity of the commodity meeting the contract's delivery specifications that can reasonably be expected to be readily available to short traders and saleable by long traders at its market value in normal cash marketing channels at the derivative contract's delivery points during the specified delivery period, barring abnormal movement in interstate commerce."

Stock Reporting Requirements

Pursuant to the rules of the Exchange, each depository is required to report to the Exchange the level of Exchange grade inventory on a daily basis. The inventory shall include eligible and registered metal. Eligible metal shall mean all such metal that is acceptable for delivery against the respective Exchange futures contract (i.e., which meets the specifications and approved brands of the respective futures contract) for which a warrant has not been issued. Registered metal shall mean eligible metal for which a warrant has been issued. Specifically, on a daily basis, each depository is required to provide the Exchange (1) the total quantity of registered metal stored at the depository, (2) the total quantity of eligible metal stored at the depository, and (3) the quantity of eligible metal and registered metal received and withdrawn from the depository.

The inventory levels at all Exchange-approved depositories for platinum and palladium are made publicly available daily on the Exchange website.¹ Further, the rules of the Exchange require an independent inventory audit to be performed annually to provide a comprehensive reconciliation of stocks stored at depositories with records maintained by both the Exchange and the depository.²

Deliverable Supply Analysis

Platinum

The Exchange determined at this time to base its estimates of deliverable supply of platinum on registered stock as well as such platinum stock meeting all specifications of the Platinum Futures contract stored at Exchange-approved depositories. The Exchange recognizes that platinum is used as an investment vehicle and as such some platinum stock may be held as a long-term investment. While surveys conducted indicated no clear consensus as to how much platinum is dedicated to long term investments, the Exchange, in an effort to represent a conservative deliverable supply that may be readily available for delivery, made a determination to discount from its estimate of deliverable supply 10% of its reported eligible platinum at this time.

As of November 29, 2024, the platinum inventory held at Exchange approved depositories totaled 137,196.275 troy ounces, the equivalent of 2,744 Platinum Futures contracts (contract size = 50 troy ounces). Exchange practice is to set spot month position limits at a maximum level of 25% of deliverable supply over the most recent three (3)-year period. Deliverable supply is calculated as the sum of total reported registered platinum with total reported eligible platinum, after taking a 10% discount for eligible platinum. Table 1 below shows the monthly average platinum stocks in Exchange approved depositories for the most recent three (3)-year period in contract equivalents.

Inventory in Exchange Approved Depositories for Platinum

Table 1 below provides the monthly inventory average of registered and eligible platinum stored at Exchange approved depositories for the period beginning December 2021 through November 2024.

Over the December 2021 through November 2024 period, the monthly average registered platinum was 3,232 futures equivalent contracts. The monthly average eligible platinum was 1,353 futures equivalent contracts accounting for a 10% discount. Based on the foregoing, the Exchange estimates monthly deliverable supply for the Platinum Futures contract at approximately 4,585 futures equivalent contracts.

¹ <http://www.cmegroup.com/market-data/reports/registrar-reports.html>

² <https://www.cmegroup.com/rulebook/NYMEX/1/7.pdf>

Table 1. Monthly Average Stock Levels at Exchange Approved Depositories for Platinum (in Contract Equivalents)

Month	Average of Registered (Contract Equivalent)	Average of Eligible (10% reduction) (Contract Equivalent)	Average Inventory Total in (Contract Equivalent)
Dec-21	7,685	2,049	9,734
Jan-22	6,416	2,763	9,179
Feb-22	5,439	2,359	7,798
Mar-22	5,528	2,277	7,806
Apr-22	5,710	2,533	8,243
May-22	4,161	2,849	7,010
Jun-22	3,965	2,236	6,200
Jul-22	2,928	2,779	5,707
Aug-22	2,507	2,218	4,724
Sep-22	2,077	2,114	4,191
Oct-22	1,511	1,793	3,304
Nov-22	1,498	1,354	2,852
Dec-22	1,559	1,048	2,608
Jan-23	2,381	1,401	3,783
Feb-23	2,370	1,395	3,765
Mar-23	2,868	1,147	4,015
Apr-23	3,542	799	4,340
May-23	3,342	697	4,038
Jun-23	3,336	672	4,008
Jul-23	2,937	816	3,753
Aug-23	2,702	773	3,475
Sep-23	2,828	885	3,713
Oct-23	3,737	732	4,469
Nov-23	3,656	665	4,320
Dec-23	3,638	584	4,222
Jan-24	3,172	1,006	4,178
Feb-24	2,912	1,012	3,924
Mar-24	2,876	963	3,839
Apr-24	2,959	960	3,919
May-24	2,971	919	3,891
Jun-24	2,741	999	3,740
Jul-24	2,152	874	3,025
Aug-24	2,135	838	2,972
Sep-24	2,099	730	2,829
Oct-24	2,034	738	2,772

Nov-24	1,963	733	2,696
3-year average	3,232	1,353	4,585

Source: CME Group

The current spot month position limit of 500 contracts represents 10.9% of the estimated monthly deliverable supply. Therefore, the proposed spot month position limit for the Platinum Weekly Friday Option is 500 contracts as these contracts would aggregate into Platinum Futures, which is a referenced contract, for position limit purposes.

Palladium

The Exchange determined at this time to base its estimates of deliverable supply of palladium on registered stock as well as such palladium stock meeting all specifications of the Palladium futures contract stored at Exchange approved depositories. The Exchange recognizes that palladium is used as an investment vehicle and as such some palladium stock may be held as a long-term investment. While surveys conducted indicated no clear consensus as to how much palladium is dedicated to long term investments, the Exchange, in an effort to represent a conservative deliverable supply that may be readily available for delivery, made a determination to discount from its estimate of deliverable supply 10% of its reported eligible palladium at this time.

As of November 29, 2024, the palladium inventory held at Exchange approved depositories totaled 38,530.573 troy ounces, the equivalent of 385 Palladium futures contracts (contract size = 100 troy ounces). Exchange practice is to set spot month position limits at a maximum level of 25% of deliverable supply over the most recent three-year period. Deliverable supply is calculated as the sum of total reported registered palladium with total reported eligible palladium, after taking a 10% discount for eligible palladium. Table 1 below shows the monthly average palladium stocks in Exchange approved depositories for the most recent three (3)-year period in contract equivalents.

Inventory in Exchange Approved Depositories for Palladium

Table 1 below provides the monthly inventory average of registered and eligible palladium stored at Exchange approved depositories for the period beginning December 2021 through November 2024.

Over the December 2021 through November 2024 period, the monthly average registered palladium was 450 futures equivalent contracts. The monthly average eligible palladium was 127 futures equivalent contracts accounting for a 10% discount. Based on the foregoing, the Exchange estimates monthly deliverable supply for the Palladium Futures contract at approximately 577 futures equivalent contracts.

Table 1. Monthly Average Stock Levels at Exchange Approved Depositories for Palladium (in Contract Equivalents)

Month	Average of Registered (Contract Equivalent)	Average of Eligible (10% reduction) (Contract Equivalent)	Average Inventory Total in (Contract Equivalents)
Dec-21	671	276	947
Jan-22	653	262	915
Feb-22	669	245	914
Mar-22	638	252	890
Apr-22	622	237	859
May-22	622	221	843

Jun-22	581	233	814
Jul-22	526	250	777
Aug-22	526	209	735
Sep-22	526	126	652
Oct-22	516	86	603
Nov-22	500	72	571
Dec-22	465	96	561
Jan-23	447	78	525
Feb-23	435	85	520
Mar-23	423	81	503
Apr-23	420	78	498
May-23	403	83	487
Jun-23	379	92	471
Jul-23	344	90	433
Aug-23	342	83	425
Sep-23	342	81	424
Oct-23	342	81	424
Nov-23	345	80	425
Dec-23	409	89	498
Jan-24	424	100	525
Feb-24	424	94	518
Mar-24	424	88	513
Apr-24	423	82	505
May-24	423	82	506
Jun-24	403	88	490
Jul-24	337	96	433
Aug-24	330	98	428
Sep-24	294	107	401
Oct-24	282	96	378
Nov-24	281	94	375
3-year average	450	127	577

Source: CME Group

The current spot month position limit of 50 contracts represents 8.7% of the estimated monthly deliverable supply. Therefore, the proposed spot month position limit for the Palladium Weekly Friday Option is 50 contracts as these contracts would aggregate into Palladium Futures, which is a referenced contract, for position limit purposes.