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BY ELECTRONIC TRANSMISSION

Submission No. 19-143
March 15, 2019

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 Resolution No. 2 of Chapter 19 for Certain Balmo 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 to Resolution No. 2 of Chapter 19, as set forth in Exhibits A and B.

Amendments to Contract Symbol of Certain Balmo Futures Contracts

The amendments change the commodity code for 15 Balance of the Month (“Balmo”) futures and 1 Balmo options contracts. The contracts currently have a structure in which each date of the determination period of the Balmo has a different commodity symbol. The contract month (“YYYYMM”) represents the determination month. Each combination of commodity symbol and contract month correspond to a different Balmo contract for a given time period. As an example, the Crude Diff – Argus LLS vs WTI 1st Line Balmo Future contract has a range of commodity symbols from 180 through 18U, corresponding to the 31 days of a calendar month. The 180 commodity symbol represents a Balmo contract with prices averaged for each day of the determination period, beginning on the first and ending on the last calendar day of the contract month, while the 181 commodity symbol represents a Balmo contract with prices averaged for each day of the determination period, beginning on the second and ending on the last calendar day of the contract month. If a market participant trades the Balmo contract on the first calendar day of the contract month, it will establish a position in the 180 contract, whereas if it trades on the second calendar day, it will establish a position in the 181 contract.

In order to simplify the commodity symbols for the certain Balmo products, the amendments provide for a single commodity symbol for each Balmo. The specific dates of the products traded will be

referenced in the contract month of the market, which will transition from the current 6-digit “YYYYMM” format to an 8-digit “YYYYMMDD” format. This commodity symbol convention aligns with existing daily futures and options contracts currently listed by the Exchange.

In connection with the commodity symbol changes, the Exchange is amending Resolution No. 2 of Chapter 19 to change the commodity symbol for the 16 Balmo contracts referenced herein. The positions limits and position accountability levels for the futures products remain unchanged. All other terms and conditions of the Balmo futures contracts will also remain unchanged.

Implementation of Commodity Symbol Amendments

The Exchange will implement the amendments on April 1, 2019, effective for all expiration months, including those with open interest. The Exchange provided public notice of its intent to amend the commodity symbols to market participants and Clearing Members on February 22, 2019, so that the transition can be effectuated in an orderly manner. Testing of the new commodity symbols has been available since February 22, 2019.

Certifications

The Exchange is not aware of any opposing views to the amendments and certifies that the commodity symbol changes and the ancillary amendments 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 commodity symbol amendments of the Balmo futures contracts are set forth in Resolution No. 2 of Chapter 19 and will be enforced by the Exchange. In addition, trading of the contracts is subject to all relevant Exchange rules which are enforced by the Market Regulation Department.

CONTRACTS NOT READILY SUBJECT TO MANIPULATION

The Balmo futures contracts are not readily subject to manipulation as they are based on established and liquid underlying cash markets. The amendments to the commodity symbol align the Exchange’s Balmo futures contracts with similar contracts currently listed by the Exchange. In addition, trading of the contracts will continue to be monitored by the Market Regulation Department.

POSITION LIMITS OR ACCOUNTABILITY

Positions in the Balmo futures contracts will continue to be subject to position limits, which are unchanged as a result of this submission. Such position limits are generally based upon the deliverable supply in the cash market or equivalent levels at other designated contract markets.

FINANCIAL INTEGRITY OF CONTRACTS

The aforementioned Balmo 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 website, 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 312-836-6745 or at patrick.swartz@theice.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Swartz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patrick Swartz
Manager
Market Regulation

Enc.

cc: Division of Market Oversight
New York Regional Office

EXHIBIT A

Contract Name	Current Commodity Code	New Commodity Code
Crude Diff – Argus LLS vs WTI 1st Line Balmo Future	180-18U	ARP
Crude Diff - WTI 1st Line vs Brent 1st Line Balmo Future	B20-B2U	BTE
Fuel Oil Diff – New York 1% Fuel Oil (Platts) vs USGC HSFO (Platts) Balmo Future	GHK-GIO	FOE
Fuel Oil Diff – New York 1% Fuel Oil vs 1% FOB NWE Cargoes Fuel Oil Balmo Future	GGF-GHJ	FOI
Fuel Oil Crack – New York 1% Fuel Oil vs WTI 1ST Line Balmo Future	GIP-GJT	FOL
Fuel Oil Outright – New York 1% Fuel Oil Balmo Future	FRA-FSE	FOX
Fuel Oil Crack – USGC HSFO (Platts) vs Brent 1st Line Balmo Future	1JH-1KB	GCT
Gasoline Diff – RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Future	1F6-1G0	GDT
Gasoline Diff – RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Mini Future	140-14U	GDR
Fuel Oil Diff – USGC HSFO (Platts) vs Fuel Oil 3.5% FOB Rotterdam Barges (Platts) Balmo Future (in Bbls)	GJU-GKY	GOD
Crude Outright – WTI 1st Line Balmo Future	02L-03F	WBT
Crude Outright – WTI Average Price Balmo Option	02L-03F	WBT
Fuel Oil Outright – USGC HSFO (Platts) Balmo Future	FPA-FQE	RBP
Gasoline Crack – RBOB Gasoline 1st Line vs Brent 1st Line Balmo Future (in Bbls)	1EB-1F5	RBQ
Gasoline Outright – RBOB Gasoline 1st Line Balmo Future	0X0-0XU	RSE
Heating Oil Arb – Heating Oil 1st Line vs Low Sulphur Gasoil 1st Line Balmo Future (in Bbls)	1IM-1JG	UL9

EXHIBIT B

Resolution No. 2 – Position Limit/Accountability Table

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)	Exchange Reportable Level
19.C.28	Crude Diff – Argus LLS vs WTI 1st Line Balmo Future	[480-48U] <u>ARP</u>	1,000	barrels	10,400	10,400	10,400	ARK	1
19.C.43	Crude Diff - WTI 1st Line vs Brent 1st Line Balmo Future	[B20-B2U] <u>BTE</u>	1,000	barrels	10,400	10,400	10,400	BTD	1
19.C.52	Fuel Oil Diff – New York 1% Fuel Oil (Platts) vs USGC HSFO (Platts) Balmo Future	[GHK-GIO] <u>FOE</u>	1,000	barrels	1,000	1,000	1,000	FOD	1
19.C.50	Fuel Oil Diff – New York 1% Fuel Oil vs 1% FOB NWE Cargoes Fuel Oil Balmo Future	[GGF-GHU] <u>FOI</u>	1,000	barrels	1,000	1,000	1,000	FOH	1
19.B.5	Fuel Oil Crack – New York 1% Fuel Oil vs WTI 1ST Line Balmo Future	[GIP-GIT] <u>FOL</u>	1,000	barrels	10,400	10,400	10,400	FOK	1
19.A.11	Fuel Oil Outright – New York 1% Fuel Oil Balmo Future	[FRA-FSE] <u>FOX</u>	1,000	barrels	1,000	1,000	1,000	FOW	1
19.B.7	Fuel Oil Crack – USGC HSFO (Platts) vs Brent 1st Line Balmo Future	[4JH-4KB] <u>GCT</u>	1,000	barrels	1,000	1,000	1,000	GCS	1
19.C.83	Gasoline Diff – RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Future	[4F6-4G0] <u>GDT</u>	1,000	mt	816	816	816	GDO	1
19.C.85	Gasoline Diff – RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Mini Future	[440-44U] <u>GDR</u>	100	mt	8,160	8,160	8,160	GDO	1
19.C.55	Fuel Oil Diff – USGC HSFO (Platts) vs Fuel Oil 3.5% FOB Rotterdam Barges (Platts) Balmo Future (in Bbls)	[GJU-GKY] <u>GOD</u>	1,000	barrels	1,000	1,000	1,000	GOE	1
19.A.5	Crude Outright – WTI 1st Line Balmo Future	[02L-03F] <u>WBT</u>	1,000	barrels	10,400	10,400	10,400	R	1
19.F.15	Crude Outright – WTI Average Price Balmo Option	[02L-03F] <u>WBT</u>	1,000	barrels	10,400	10,400	10,400	R	1
19.A.14	Fuel Oil Outright – USGC HSFO (Platts) Balmo Future	[FPA-FQE] <u>RBP</u>	1,000	barrels	1,000	1,000	1,000	RBO	1
19.B.10	Gasoline Crack – RBOB Gasoline 1st Line vs Brent 1st Line Balmo Future (in Bbls)	[4EB-4F6] <u>RBQ</u>	1,000	barrels	6,800	6,800	6,800	RBR	1
19.A.18	Gasoline Outright – RBOB Gasoline 1st Line Balmo Future	[0X0-0XU] <u>RSE</u>	1,000	barrels	6,800	6,800	6,800	RBS	1
19.C.70	Heating Oil Arb – Heating Oil 1st Line vs Low Sulphur Gasoil 1st Line Balmo Future (in Bbls)	[4IM-4JG] <u>UL9</u>	1,000	barrels	2,900	2,900	2,900	ULM	1