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BY ELECTRONIC TRANSMISSION

Submission No. **20-01**
March 25, 2020

Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Listing of Commodity Swaps and Related Rule Amendments- Submission Pursuant to Section 5c(c)(1) of the Act and Regulations 40.2 and 40.6(a)

Dear Ms. Jurgens:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the "CEA") and the Commodity Futures Trading Commission (the "Commission") Regulations 40.2 and 40.6(a), ICE Swap Trade, LLC ("IST" or "SEF") submits by written certification the terms and conditions for one (1) new cash-settled Gasoline contract (the "Energy Contract"). The Energy Contract will be listed as a permitted contract for trading on March 30, 2020 (based on an acknowledged filing date of March 26, 2020). The Energy Contract is a monthly cash settled swap.

The contract terms and conditions are set forth in Chapter 13 of the ICE Swap Trade Rulebook ("Rules") and in related amendments to existing Rules, as specified in **Exhibit A**. The underlying cash market analysis for the new Energy Contract is contained in **Exhibit B**. A copy of the revised Rulebook marked to show changes against the Rulebook submitted to the Commission with an effective date of March 30, 2020, is attached as **Exhibit C**, and a clean copy of the revised Rulebook is attached as **Exhibit D**. The SEF is listing the Energy Contract as noted in the table below:

Rule	Code	Contract Name
13110	GDG	Eurobob Oxy FOB Rotterdam Barges Swap

Certifications

IST certifies that the rules and amendments related to the listing of the Energy Contract comply with the requirements of the CEA and the rules and regulations promulgated by the Commission thereunder. IST has reviewed the Core Principles and has determined that the listing of the Energy Contract impacts the following relevant Core Principles:

COMPLIANCE WITH RULES (Principle 2): The terms and conditions of the Energy Contract are set forth in Chapter 13 of the Rules, which will be enforced by IST. Trading of the Energy Contract is subject to all relevant IST rules which are enforced by the Market Regulation Department.

SWAPS NOT READILY SUSCEPTIBLE TO MANIPULATION (Principle 3): In accordance with the guidelines set forth in Appendix C to Part 38 of the CEA, the Energy Contract should not be readily subject to manipulation as it is based on a liquid cash market and a widely accepted benchmark as demonstrated in the analysis included in Exhibit C. The contract size, listing cycle, quotation basis, final settlement and minimum price fluctuation for the Energy Contract is common amongst related contracts listed by other SEFs and DCMs. In addition, the Energy Contract will be subject to market surveillance by IST Market Regulation staff to detect attempted manipulation.

Platts, the administrator of the referenced indices, has established comprehensive rules governing assessment prices and price reporting structures that is publicly available, transparent, and widely accepted and understood by market participants. The prices included in all of Platts' indices are subjected to a rigorous series of quality control processes. Platts publishes benchmark price assessments for oil markets and its price reporting is well known in the industry as fair and accurate. The oil indexes Platts publishes are based on original reporting that is collected by Platts from actual buyers and sellers. Platts also employs a comprehensive compliance review of submissions and its methodologies to ensure the published prices accurately reflect physical deals. Platts' rules, index descriptions and pricing methodology for oil is publicly available on its website¹.

MONITOR OF TRADING AND TRADE PROCESSING (Principle 4): All contracts listed for trading by IST are subject to prohibitions against abusive trading practices as set forth in Chapter 5 of the IST Rulebook. The Market Regulation staff actively monitors all IST markets to detect abusive practices.

ABILITY TO OBTAIN INFORMATION (Principle 5): IST has rules and procedures in place that allow for the collection of non-routine data from Participants and Customers. In addition, IST has agreements in place with other regulatory, data repository and reporting services.

TIMELY PUBLICATION OF TRADING INFORMATION (Principle 9): IST will publish on its website and distribute through quote vendors contract trading volume, open interest levels, and daily price information in accordance with Part 16. IST will also adhere to the reporting requirements as detailed in Part 43 and 452 of the Commission's Rules. Prior to the commencement of trading, the terms and conditions for the Energy Contracts will be available on IST's website. In addition, IST will publish on a daily basis the settlement prices, volume, open interest and the opening and closing ranges for actively traded contracts.

RECORDKEEPING AND REPORTING (Principle 10): IST has rules and procedures in place to require Participants and Customers to maintain records of their trading and provide for the recording

¹ <http://www.platts.com/methodology-specifications/oil>

² 17 CFR Part 43 Real-Time Public Reporting of Swap Transaction Data and 17 CFR Part 45 Swap Data Recordkeeping and Reporting Requirements.



and storage of the requisite trade information sufficient for the Market Regulation Department to detect and prosecute customer and market abuses.

DISCIPLINARY PROCEDURES (Principle 13): Pursuant to Chapters 8 of the IST Rulebook, the Market Regulation Department has the authority to sanction, suspend or expel members and market participants that violate SEF rules.

DISPUTE RESOLUTION (Principle 14): Participants may arbitrate claims arising from trading of IST's contracts in accordance with Chapter 9 of the IST Rulebook. Such arbitration is mandatory for claims by customers against SEF Participants and for claims by SEF Participants against each other. Non-Participants with claims arising from trading of IST's contracts may also opt for SEF arbitration.

IST not aware of any substantive opposing views expressed with respect to the rules and the amendments. IST further certifies that concurrent with this filing, a copy of this submission was posted on its website, which may be accessed at: (<https://www.theice.com/swap-trade/regulation>).

If you have any questions or need further information, please contact the undersigned at (312) 323-8512 or Kurt.Windeler@theice.com.

Sincerely,

A handwritten signature in black ink that reads "Kurt Windeler".

Kurt Windeler
Chief Compliance Officer

cc: Division of Market Oversight



EXHIBIT A

Rule 13110. ~~RESERVED~~ Eurobob Oxy FOB Rotterdam Barges Swap

Contract Description: A monthly cash settled swap based on the Platts daily assessment price for Eurobob Oxy FOB Rotterdam Barges.

Contract Symbol: GDG

Contract Size: 1,000 metric tonnes

Unit of Trading: Any multiple of 1,000 metric tonnes

Currency: US Dollars and cents

Trading Price Quotation: One cent (\$0.01) per metric tonne

Last Trading Day: Last Trading Day of the contract month

Final Settlement Price: In respect of final settlement, the Floating Price will be a price in USD and cents per metric tonne based on the average of the “Mid” quotations appearing in the “Platts European Marketscan” under the heading “Northwest Europe barges” subheading “FOB Rotterdam” for “Eurobob” for each business day (as specified below) in the determination period.

Contract Series: Up to 60 consecutive months, or as otherwise determined by the SEF

Final Payment Dates: Five (5) New York Business Days after each settlement date via wire transfer of Federal funds

Business Days: Publication days for Platts European Marketscan

Other Terms: To be confirmed directly between the parties in their full form of contract. The terms reflected in such contracts shall be controlling.

EXHIBIT B

I. Eurobob Oxy FOB Rotterdam Barges Overview

The barge assessment reflects a blendstock that after the addition of 4.8% maximum of ethanol meets EN 228 gasoline. A maximum oxygenate content of 0.9% by weight is reflected. The assessment reflects parcels of 1,000 to 5,000mt. The assessment reflects material for loading 3-15 (Monday to Tuesday) or 5-15 (Wednesday through Friday) days from date of publication, with value normalized to reflect the mean value of the loading period. Gasoline barges reflect a basis location of Amsterdam/Rotterdam (AR).

II. Underlying Cash Market For Listed Swaps

The Platts Market on Close Assessment process (MOC) is the tool used by Platts to determine and assess the physical market. The Methodology and Specifications Guide for crude oil assessments is contained here: <https://www.spglobal.com/platts/plattscontent/assets/files/en/our-methodology/methodology-specifications/europe-africa-refined-products-methodology.pdf>

a. Eurobob Oxy FOB Rotterdam Barges

The underlying cash market that underpins this derivative contract is the Platts assessments of physical barges for Gasoline Eurobob FOB loading at Amsterdam/Rotterdam. Regarding the physical assessment, there have been 24 trades on the corresponding instrument between nine (9) market participants. In 2020, the Eurobob market has seen 115 bids and offers.