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BY ELECTRONIC TRANSMISSION

Submission No. **21-06**
May 05, 2021

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(a) 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(a) and 40.6(a), ICE Swap Trade, LLC (“IST” or “SEF”) submits by written certification the terms and conditions for one new cash-settled contract (the “Energy Contract”). The Energy Contract will be listed as a permitted contract for trading on May 7, 2021 (based on an acknowledged filing date of May 05, 2021). 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 May 7, 2021, is attached as **Exhibit C**, and a clean copy of the revised Rulebook is attached as **Exhibit D**. The SEF is listing the Energy Contracts as noted in the table below:

Rule	Code	Contract Name
13115	WIM	WIM LNG Swap

Certifications

IST certifies that the rules and amendments related to the listing of the Energy Contracts 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 Contracts impacts the following relevant Core Principles:

COMPLIANCE WITH RULES (Principle 2): The terms and conditions of the Energy Contracts are set forth in Chapter 13 of the Rules, which will be enforced by IST. Trading of the Energy Contracts 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 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 Contracts are common amongst related contracts listed by other SEFs and DCMs. In addition, the Energy Contracts 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 liquefied natural gas markets and its price reporting is well known in the industry as fair and accurate. The liquefied natural gas 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 liquefied natural gas 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

¹ <https://www.spglobal.com/platts/plattscontent/assets/files/en/our-methodology/methodology-specifications/Ingmethodology.pdf>

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



require Participants and Customers to maintain records of their trading and provide for the recording 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 13115. ~~Reserved~~ WIM LNG Swap

Contract Description: A monthly cash settled swap based on the Platts daily assessment price for the LNG West India Marker (WIM).

Contract Symbol: WIM

Contract Size: 10,000 MMBtu per contract month

Unit of Trading: Any multiple of 10,000 MMBtus

Currency: US Dollars and cents

Trading Price Quotation: One tenth of one cent (\$0.001) per MMBtu

Last Trading Day: Trading shall cease on the 15th calendar day of the calendar month prior to the contract month. If the 15th calendar day is not a business day, then trading shall cease on the next preceding business day.

Final Settlement Price: In respect of final settlement, the Floating Price will be a price in USD and cents per MMBtu based on the average of the relevant quotations appearing in "Platts LNG Daily" under the heading "Platts daily LNG markers (\$/MMBtu)" subheading "DES West India Marker (WIM)" for "DES WIM (month)" (symbol AARXS00) for each business day (as specified below) in the determination period.

Non-Common Pricing applies.

Contract Series: Up to 12 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 LNG Daily

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. Asia LNG WIM

The underlying cash market that underpin this derivative contract is the Platts West India Marker (WIM)—the assessment of physical LNG cargoes delivered into India, Dubai and Kuwait.

II. Underlying Cash Market For Asia LNG WIM

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/lngmethodology.pdf>

Cash Market Analysis for Asia LNG WIM

An important regional LNG trading hub has developed in the Middle East-India (MEI) zone. In 2020, the MEI trading hub accounted for about 32 million mt of LNG imports, equivalent to around 16.5% of the JKTC trading zone. But by 2030 this is forecast to reach about 22.5% of the JKTC volume, according to S&P Global Platts Analytics.

Additionally, the Indian government is pushing to increase gas from 6% to 15% of the total energy mix by 2030 and create a gas-based economy. LNG imports into India have nearly doubled with imports in 2020 expected to be over 26 million mt, from 13.9 million mt in 2014.

There is accelerating adoption of WIM in spot and term contracts seen in the rising number of WIM-linked bids, offers and trades in the MOC process, as well as rising usage in domestic gas supply and LNG cargo contracts in India.

LNG imports are expected to account for a large percentage of natural gas supply in India, with the WIM seen as the anchor for deliveries into core demand areas.

The market for the delivery of the underlying is robust and growing. One market participant issued one of the largest domestic gas sell-tenders in India for 4.5 million standard cu m/day, equivalent to 1.2 million mt of LNG/year, of gas supply through 2022. In 2020, India's largest gas producer signed 3-year contracts that total about 0.75 million standard cu m/day of the underlying delivery linked to WIM.

There is also significant trading interest based on the WIM assessment in the Asia LNG physical MOC, with several companies actively submitting bids, offers and trades for India and Middle East deliveries for publication during the process.

As of early 2021, 40 entities have expressed interest to submit bids, offers and trades within the Asia LNG derivatives MOC process, and have completed the review process to do so. West India and Middle East deliveries represent about 12% of all Asia LNG MOC indications.

The WIM Futures contract at ICE Futures Europe has open interest of 720 contracts as of the date of this filing.