Via Portal Submission
May 8, 2017
MGEX Submission No. 17-11
Mr. Christopher J. Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
$115521^{\text {st }}$ Street NW
Washington, DC 20581

## RE: Rule Certification Submission Pursuant to CFTC Regulation 40.6(a); Update to MGEX Rules

Dear Mr. Kirkpatrick:
Pursuant to Section 5c(c) of the Commodity Exchange Act ("CEAct") and Commodity Futures Trading Commission ("CFTC") Regulation 40.6(a), the Minneapolis Grain Exchange, Inc. ("MGEX" or "Exchange") hereby certifies that MGEX Rule 2071.00., as set forth in the attached Exhibit A, complies with the CEAct and the CFTC Regulations promulgated thereunder (the "Proposed Amendments"). MGEX further certifies that the submission and pending changes to the MGEX Bylaws and Rules have been posted on the MGEX website at the following link: http://www.mgex.com/regulation.html.

## I. AMENDMENTS TO MGEX RULES

MGEX continually evaluates its Rules to ensure compliance with CFTC regulations as well as general principles of law. The Proposed Amendments provide a process for the Exchange Officers to make non-substantive amendments and updates to the MGEX Rules. The Proposed Amendments allow MGEX to be responsive and timely to nonsubstantive issues like updating citations to applicable CFTC regulations or cross references within the MGEX Rules.

## II. COMPLIANCE WITH CORE PRINCIPLES.

MGEX has reviewed the core principles for designated contract markets ("DCM Core Principles"), for derivate clearing organizations ("DCO Core Principles) and identified that the Proposed Amendments may impact the following DCM Core Principles:

- DCM Core Principle 2, Compliance with Rules: The Proposed Amendments will provide greater clarity to the MGEX Rules by allowing non-substantive changes to be made to the MGEX Rules to enhance organization, content, or formatting.
- DCM Core Principle 12, Protection of Markets and Market Participants: The Proposed Amendments will further enhance MGEX's ability to protect the market and market participants by allowing for timely updates and amendments to the MGEX Rules on non-substantive matters.
- DCO Core Principle L, Public Information: The Proposed Amendments allow for greater clarity and timely amending of the MGEX Rules regarding non-substantive changes. Such amendments provide the public with clearer rules in a timelier manner.

Pursuant to the authority set forth in MGEX Bylaw 210.01., the MGEX Board of Directors unanimously approved the Proposed Amendments at its meeting held on April 25, 2017. There were no substantive opposing views expressed by the Board of Directors, nor is MGEX aware of any substantive opposing views with respect to this filing.

These amendments are intended to become effective ten (10) days from the date of this submission. If there are any questions regarding this submission, please contact me at (612) 321-7188. Thank you for your attention to this matter.

Best regards,


Emily Spott
Associate Corporate Counsel

Enclosure

## EXHIBIT A

### 2071.00. EXCHANGE OFFICER AMENDMENTS

The Exchange Officers, by majority vote, shall have the authority to amend any Rule without a vote of the Ownership or the Board of Directors when such amendment does not alter the intent of the Rule or is otherwise non-substantive. Examples of amendments include, but are not limited to, the modification or elimination of letters, numbers, words, phrases, sentences, Rule numbers, Rule titles, chapter numbers, chapter titles, and cross references (internal and to applicable law) necessary to maintain accurate and current Rules, or are necessary to comply with any change in law, statute or governing legal authority.

