



Via Portal Submission

September 29, 2023  
MGEX Submission No. 23-57

Mr. Christopher Kirkpatrick  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street NW  
Washington, DC 20581

**RE: Rule Certification Submission Pursuant to Regulation 40.6(a); Amendment to MGEX Rules**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Exchange Act (“CEAct”) Section 5c and Commodity Futures Trading Commission (“CFTC” or “Commission”) Regulation 40.6(a), the Minneapolis Grain Exchange, LLC (“MGEX” or “Exchange”) hereby certifies that the attached amendments to the MGEX Rules (the “Proposed Amendments”) comply with the CEAct and CFTC Regulations. MGEX further certifies that the submission and pending changes to the MGEX Rules have been posted on the Exchange website at the following link: <http://www.mgex.com/regulation.html>.

**Overview of Rule Amendment**

MGEX is making the Proposed Amendments to change the time that the Bitnomial Settlement Facility opens to delivering Market Participants from 5:00 p.m. to 9:00 a.m.

**DCO Core Principles**

In connection with the Proposed Amendments, the Exchange has reviewed the core principles for DCOs (“DCO Core Principles”) and has determined that the amendments comply with the requirements of such principles. During the review, MGEX identified the following DCO Core Principles as potentially being impacted:

- *DCO Core Principle L – Public Information:* Core Principle L requires DCOs to provide market participants with sufficient information and to have clear and comprehensive rules and procedures. The Proposed Amendments will be incorporated into the Exchange’s Rules, which are posted publicly on the MGEX website in satisfaction of this core principle.

Pursuant to MGEX Bylaw 3.1., the Proposed Amendments were approved on September 29, 2023. There were no substantive opposing views expressed with respect to this filing.

The Proposed Amendments are to be effective when incorporated into the MGEX Rulebook and posted on its website, which will be at least 10 business days following the date of this submission. If there are any questions regarding this submission, please contact me at (612) 321-7176 or [jkrause@mgex.com](mailto:jkrause@mgex.com). Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'JK', is positioned above the typed name and title.

James D. Krause  
Associate Corporate Counsel, DCO & Int'l

**MINNEAPOLIS GRAIN EXCHANGE, LLC**

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[mgex.com](http://mgex.com)

## EXHIBIT A

The following MGEX Rule is to be amended. Additions are underlined> while deletions are marked through.

### CHAPTER 23 BITNOMIAL EXCHANGE CLEARING RULES

#### 23.12.4. DELIVERY PROCEDURES AND REPORTING.

Unless stated otherwise, the Clearing House will electronically issue notices and reports to relevant Clearing Members.

Delivery of a Bitnomial Exchange Contract is based upon open positions after contract expiration. The delivery process, as set forth below, consists of the following requirements and deadlines (all references to days are Business Days and times are noted in Central time):

<b>T-5</b>	<b>5 Days Prior to Last Trading Day</b>	<b>5:10 p.m.</b>	Clearing Members file Bitnomial delivery files and all other requested information at the end of each day with the Clearing House.
<b>T-3</b>	<b>3 Days Prior to Last Trading Day (start of Delivery Period)</b>	<b>59:00 p.m.</b>	Settlement Facility opens to delivering Market Participants.
<b>T</b>	<b>Last Trading Day of Contract</b>	<b>9:30 a.m.</b>	Clearing Members are responsible for ensuring all Market Participants making delivery deliver underlying asset through Settlement Facility.
		<b>5:10 p.m.</b>	Clearing Members file Bitnomial delivery files with the Clearing House, which will serve as a binding Delivery Notice to MGEX.
		<b>8:45 p.m.</b>	Clearing House issues final Delivery Report and corresponding payment information.
<b>T+1</b>	<b>Delivery Day</b>	<b>11:30 a.m.</b>	All payments for delivery are due to the delivering Clearing Member.
		<b>12:30 p.m.</b>	Clearing Member notification to Bitnomial Exchange and Clearing House regarding receipt of final payment is due.

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		<b>By 7:00 p.m.</b>	Delivery process and movement of corresponding Digital Assets is completed.
<b>T+2</b>	<b>Release of Margin</b>	<b>By 9:00 a.m.</b>	Provided that notification of delivery has been received by the applicable Delivery Day deadlines, MGEX will release margins.

Any discrepancies or material reporting errors may result in MGEX disciplinary action.

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