



August 16, 2012

Commodity Futures Trading Commission David A. Stawick, Secretary of the Commission 1155 21st Street NW Washington, DC 20581

Dear Commissioners:

On behalf of Hoosier Energy Rural Electric Cooperative, Inc., I am writing to support the Cooperative Exemption that would allow certain financial cooperatives to qualify for exclusion from the potentially costly clearing and margin requirements of the Dodd-Frank Act.

The proposed Cooperative Exemption would effectively pass through the end-user exception available to co-ops like mine to financial cooperatives that serve the electric cooperative network, such as the nonprofit National Rural Utilities Cooperative Finance Corporation (CFC) of which we are a member-owner. We believe that this "pass-through" is appropriate due to the unique member-owner structure of cooperatives.

Hoosier Energy is a generation and transmission cooperative providing wholesale electric power and services to 18 member electric distribution cooperatives in central and southern Indiana and southeastern Illinois. About 650,000 residents, businesses, industries and farms in Indiana and Illinois rely on the generation, transmission and distribution network for electric power. As a member-owner of CFC, Hoosier Energy relies on CFC to provide us with essential financial products that are critical to meeting the needs of our electric consumers. My cooperative has used CFC funds over the past 25 years to construct renewable generation facilities, to make improvements and environmental upgrades at existing baseload generating facilities, to extend and upgrade transmission infrastructure, and to provide liquidity for general corporate purposes.

In connection with making loans to us, CFC uses over-the-counter interest rate swaps to mitigate its business risks. This use of such financial tools is

instrumental in helping CFC make loans to rural electric cooperatives at the lowest possible cost of funds. If new requirements are imposed on CFC, the increased costs will undoubtedly be borne by our consumers in the form of higher rates.

I believe it is appropriate for CFC, as a cooperative financial entity owned by electric cooperatives, to be exempt from clearing and margin requirements, just as individual co-ops like mine would be exempt if they executed these transactions on their own.

I appreciate your consideration of my views.

Sincerely,

Donna L. Snyder

Vice President and

Chief Financial Officer