

August 16, 2012

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

Re: Clearing Exemption for Certain Swaps Entered Into by Cooperatives (Exempt Cooperatives), [RIN 3038-AD47]

The National Rural Utilities Cooperative Finance Corporation (CFC) appreciates this opportunity to provide comments to the Commodity Futures Trading Commission (CFTC or Commission). CFC strongly supports the proposed rule on Clearing Exemption for Certain Swaps Entered Into by Cooperatives (Cooperative Exemption or NPRM). We agree with the Cooperative Exemption's underlying premise that the member-owned nature of cooperatives means that a qualifying cooperative is acting on behalf of its non-financial end-user members. Therefore it is both logical and sound policy to pass-through the end-user exception available to members of the cooperative to the cooperative itself. We appreciate the CFTC taking into account the June 15, 2011 comment letter advocating an exemption such as the one proposed in the NPRM which was signed by approximately 500 individuals associated with CFC's nonprofit member rural electric cooperatives.¹

The Cooperative Exemption makes sense, represents good policy, protects the public interest, and is consistent with both Congressional intent² and the specific provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (DFA). Consistent with the pass-through premise of the proposed

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¹ For your convenience, the June 15, 2011 letter is attached as Exhibit 1.

² For instance, in addition to the rationale for the proposed Cooperative Exemption described in this letter, section 722(f) of the DFA states that public interest waivers should be provided for certain swap transactions involving rural electric cooperatives. Section 722(f) states that: "If the Commission determines that the exemption would be consistent with the public interest and purposes of this Act, the Commission shall...exempt from the requirements of this Act an agreement, contract, or transaction that is entered into...between entities described in section 201(f) of the Federal Power Act...." Entities described in 201(f) can include CFC because it acts as an "instrumentality" of its member rural electric cooperatives. The Federal Power Act defines 201(f) entities to include, "an electric cooperative that receives financing under the Rural Electrification Act of 1936 (7 U.S.C. 901 et seq.) or that sells less than 4,000,000 megawatt hours of electricity per year, or any... instrumentality of any one or more of the foregoing." (emphasis added).

Cooperative Exemption, swaps that would be exempt from clearing requirements under the Cooperative Exemption would be subject to the same limits imposed on end-users in the end-user exception to clearing.³ Thus CFC believes that the proposed Cooperative Exemption would promote fair competition, consistent with the requirements of section 4(c) of the Commodities Exchange Act (CEA). Also, given the limited nature of the proposed exemption, the proposal represents a responsible financial innovation, also consistent with the requirements of section 4(c) of the CEA, and is a reasoned approach to limiting risk.

The Cooperative Exemption is extremely narrowly constructed. The CFTC estimates that approximately ten cooperatives will be eligible for the Cooperative Exemption.⁴ Specifically, the proposed Cooperative Exemption applies only to cooperatives that:

- (i) are financial entities as defined in section 2(h)(7)(C)(i) of the CEA, solely because of section 2(h)(7)(C)(i)(VIII) of the CEA⁵;
- (ii) are formed and existing as a cooperative pursuant to Federal or state law; and
- (iii) consist only of members that are entities that could elect the end-user exception themselves.⁶

Questions Posed in the Notice of Proposed Rulemaking

As discussed above, CFC strongly supports the proposed Cooperative Exemption. The following are our comments in response to questions posed in the preamble to the proposal. For ease of reference, we have reiterated the questions asked in the preamble to the NPRM in italics followed by CFC's response.

Q: Has the Commission correctly limited the exemption to cooperatives in which each member is: a non-financial entity, a financial entity to which the small financial institution exemption applies, or a cooperative each of whose members fall into those categories?

A: We believe the proposal correctly implements the Commission's stated goal.

// <u>Fed</u>. <u>Reg</u>. at 41946

³ "End-User Exception to the Clearing Requirement for Swaps," 77 Fed. Reg. 42560-42591 (July 19, 2012).

⁴ 77 Fed. Reg. at 41946.

⁵ That section defines a financial entity for purposes of the CEA as "a person predominately engaged in activities that are in the business of banking, or in activities that are financial in nature, as defined in section 1843(k) of title 12." Section 1843(k) includes lending activities within its list of enumerated activities that are financial in nature.

⁶ As the Commission noted in the preamble to the proposal, the limitations assure that the Cooperative Exemption will not be available to cooperatives that have members that are non-exempt financial entities as defined in Section 2(h)(7)(C) of the CEA. For example, the Commission notes that the Cooperative Exemption would not be available to the Federal Home Loan Banks, whose membership includes financial entities that are not small financial institutions. 77 Fed. Reg. at 41942, fn. 15.

Q: Are there cooperatives in which not all members are a non-financial entity, a financial entity to which the small financial institution exemption applies, or a cooperative each of whose members fall into those categories? If so, should the proposed definition of "exempt cooperative" be modified to include them?

A: CFC is in agreement with the approach taken in the proposed rule that limits the exemption in a manner consistent with the premise of the pass-through concept.

Q: Would such inclusion undermine the narrow pass-through focus of the rule?

A: Because CFC is in agreement with the approach taken by the CFTC in the proposed rule, CFC is not advocating for such a change to the definition of "exempt cooperative."

Q: Is it possible that financial entities that do not currently operate as cooperatives and for which the clearing requirement is intended could reorganize or create cooperatives to take advantage of the proposed cooperative exemption? If so, how could the proposed rule be modified to prevent that from happening?

A: CFC believes it would be difficult for financial entities that are not organized as cooperatives to reorganize or create cooperatives as most financial entities are stock corporations and could not easily reorganize into cooperatives.

Q: Should affiliates of financial entities identified in Sections 2(h)(7)(C)(i)(I) through (VII) of the CEA be expressly excluded from the definition of exempt cooperative?

A: CFC is in agreement with the proposed rule which would exclude such affiliates from the exemption.

Q: The Commission invites comment on whether the types of swaps for which the cooperative exemption may be elected should be expanded or further limited and why. If so, please describe such expansion/limitation specifically.

A: CFC is in agreement with the proposed rule. CFC currently only uses interest rate swaps. In the past when CFC had certain foreign denominated debt, it used currency swaps to mitigate risk. CFC urges the Commission to ensure that interest rate swaps and currency swaps (if not determined to be exempt from the definition of swap by the Secretary of the Treasury pursuant to Section 1a(47)(E) of the CEA) are eligible for exemption from clearing in any final rule implementing the proposed Cooperative Exemption.

Q: Is the provision allowing for swaps that hedge or mitigate risk "related to loans to members" too limited or not limited enough?

A: CFC agrees with this limitation and believes that it is consistent with the pass-through concept underlying the proposed Cooperative Exemption and that this limitation is also consistent with section 722(f) of the DFA.⁷

Q: What clarifying language could be added to more effectively identify such swaps that would be consistent with the rationale used for the proposed rule regarding the cooperative standing in place of its members when entering into hedging swaps with other financial entities?

A: CFC does not believe that any clarifying language is necessary.

Q: Are there practical or other considerations in identifying which swaps serve to hedge or mitigate the risk of member loans or member loan related swaps?

A: CFC believes that this standard is appropriate and that it can be implemented in a practical manner.

Q: Are there additional or alternative considerations that should be reviewed by the Commission regarding the proposed cooperative exemption?

A: Yes. For the sake of consistency in referring to financial entities and non-financial entities, CFC suggests a modification to the cross reference to the definition of hedging or mitigating commercial risk in 39.6(c). Section 39.6(c)(1)(i) refers to "the reduction of risks in the conduct and management of a commercial enterprise, where the risks arise from ..." (emphasis added). We suggest that the CFTC add a provision which provides that the term "a commercial enterprise" as used in 39.6(c)(1)(i) be replaced with the term "exempt cooperative." This change will promote clarity as non-financial entities are sometimes referred to as commercial entities, and is consistent with the approach taken by the CFTC elsewhere in the NPRM.⁸

CFC would also like to request that the CFTC coordinate with the prudential regulators that are currently drafting margin requirements for non-cleared swaps, that is the Office of Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Farm Credit Administration, and the Federal Housing Finance Agency, (collectively, the Agencies). CFC urges the CFTC and the prudential regulators to take an approach in finalizing their proposed rules on margin

⁷ See <u>supra</u>fn. 2.

⁸ See proposed § 39.6(f)(2)(i), which provides that the term "insured depository institution" as used in 17 C.F.R. § 1.3(ggg)(5)(i), (ii), and (iii) is replaced with the term "exempt cooperative."

required for uncleared swaps that is consistent with the pass-through approach taken in the proposed Cooperative Exemption. In other words, CFC requests that the CFTC and the prudential regulators not impose minimum regulatory margin thresholds for swaps that would be exempt from clearing under the proposed Cooperative Exemption, but instead follow the approach taken in the proposed margin requirement rules for non-financial counterparties and only require the posting of margin required pursuant to the credit support arrangement between the parties.⁹

Q: Would a cooperative exemption have any adverse impact on competition?

A: CFC does not believe the proposed Cooperative Exemption would have an adverse impact on competition. The proposed Cooperative Exemption is based on the pass-through concept and is simply extending to the cooperative entity, the exemption to which its members would otherwise be entitled. Also, as noted above, the exemption has been narrowly drawn, and thus should mitigate the impact on competition.

Q: Would a cooperative exemption have an impact on fees or other charges for any products and/or services?

A: Yes, the Cooperative Exemption would permit CFC to avoid cost increases that would be passed onto our member rural electric cooperatives. CFC and its nonprofit members depend on the flexibility and cost-effectiveness of the over-the-counter interest rate swaps market. A key component of CFC's ability to keep funding costs low and provide members with flexibility in managing their debt portfolios as well as attractive interest rates has been CFC's ability to utilize over-the-counter derivatives to hedge interest rate risk, never to speculate. As a result, our members benefit by paying lower rates. Those benefits are passed on to the rural ratepayer customers our members serve. If we were required to post margin, as contemplated in the NPRM, our costs would rise significantly, and we would have to pass those costs on to our members. The proposed Cooperative Exemption is also consistent with Congressional intent in providing special treatment for rural electric cooperatives and their instrumentalities, such as CFC. ¹⁰

Q: Would a cooperative exemption result in efficiencies or other benefits not described in this NPRM?

A: CFC currently engages in uncleared swaps in connection with its lending activities. The primary benefits to CFC's member-owners, the rural electric cooperatives, of using uncleared swaps are the lower

⁹ As the Agencies noted in their notice of proposed rulemaking, the DFA requires the CFTC, the Securities and Exchange Commission, and the Agencies to establish and maintain, to the maximum extent practicable, capital and margin requirements that are comparable, and to consult with each other periodically (but no less than annually) regarding these requirements. 77 Fed. Reg. at 27566 (May 11, 2011).

¹⁰ See supra fn. 2.

costs and increased flexibility associated with such transactions, as discussed in response to the prior question. CFC also realizes benefits that may be broadly characterized as reduced funding costs and efficiency related benefits, which we summarize below. We would, once again, urge the CFTC to coordinate with the Agencies with respect to their proposed margin rulemaking to ensure that uncleared swaps receive consistent treatment, as the benefits also arise from CFC's ability to utilize swaps that are not currently subject to margin requirements.

The Proposed Cooperative Exemption Would Result in Efficiency-Related Benefits

- Over-the-counter (OTC) swaps are more efficient because they can be tailored for specific transactions, e.g., based on amount and term. In addition, OTC swaps allow for more efficient one-off match funding.
- CFC offers its nonprofit member cooperatives substantial flexibility in interest rate terms so that they can best achieve their public purpose objectives. Thus, these cooperatives drive CFC's balance sheet. As a Cooperative lender with the aim of providing our members with the lowest cost financing and given the flexibility that our members need, it is more efficient for CFC to use interest rate swaps to manage the unknown future interest rate decisions that our members will make, rather than embedding costly optionality into CFC's funding instruments. When our members do switch from variable rates to fixed rates, to minimize the resulting mismatch CFC uses interest rate swaps to convert the liability cash-flow streams to match this movement. If it was not for swaps, CFC could not do this in the cash-market because CFC generally issues bullet, non-callable bonds.
- CFC follows a match-funding policy where loan cash-flows are matched with cost of borrowings and equity to mitigate interest rate risk. If CFC could not enter into tailored OTC swaps, CFC would have more difficulty in efficiently match-funding these types of loans using a cash market instrument.
- The cost and administrative burden of posting collateral to a central clearinghouse would have a substantial negative effect on CFC's business. Collateral posting requires daily valuation. This additional work would mean that costs would be incurred for additional staff resources that would be needed to manage this operation.

Background on CFC

CFC is a nonprofit, member-owned cooperative that was incorporated under the District of Columbia Cooperative Association Act in April 1969. The National Rural Electric Cooperative Association, an association of approximately 1,000 nonprofit, rural electric utility cooperatives serving rural America, was instrumental in forming CFC. As a cooperative, CFC is 100% owned by and serves its membership, which consists solely of member-owned nonprofit entities or subsidiaries or affiliates of nonprofit entities. The great majority of CFC members are member-owned cooperatives, with a small number being public corporations, utility districts or national, regional or statewide associations of cooperatives.

From its inception, CFC's purpose has been to provide its members with loans, and other types of financing, to supplement the loan programs of the Rural Utilities Service (RUS), an agency of the U.S. Department of Agriculture. With the help of CFC financing, its members acquire, construct, maintain, upgrade and operate all types of electric distribution, generation, transmission and related facilities. At May 31, 2012, loans and guarantees outstanding to CFC's borrowers totaled approximately \$20 billion.

As a nonprofit cooperative, CFC's objective is to offer its members cost-based financial products and services consistent with sound financial management and is not to maximize net income. Thus, CFC's purpose is to maximize benefits for its nonprofit, consumer-owned rural electric cooperative members. Approximately 190 CFC members receive 100% of their financing from CFC, with the balance of approximately 800 members receiving financing at varying levels from CFC, RUS and other sources. CFC's members provide reliable, affordable electricity in 48 states to individuals, families, public agencies and businesses encompassing a population of approximately 42 million people.

Conclusion

For the reasons noted above, we strongly support the proposed Cooperative Exemption. We appreciate your consideration, and we would welcome the opportunity to further discuss our views. Please do not hesitate to contact Richard E. Larochelle, CFC's Senior Vice President of Corporate Relations, at (703) 467-7406, rich.larochelle@nrucfc.coop should you wish to discuss any of our comments or need additional information.

Exhibit 1

June 15, 2011

Commodity Futures Trading Commission 1155 21st Street NW Washington, DC 20581

As member-owners of the National Rural Utilities Cooperative Finance Corporation (CFC), our wholly owned cooperative that provides us with financing, we encourage the CFTC to clarify in rulemaking that CFC, as an "end user" of derivatives, is exempt from the new margining and clearing requirements under the Dodd-Frank Act (DFA).

By way of background, CFC is a nonprofit cooperative entity created and owned by consumer-owned rural electric cooperatives (RECs). We, the RECs, established CFC in 1969 to supplement the loan programs of the U.S. Department of Agriculture. Since that time, we have continued to rely on CFC to provide us the financing necessary to deliver our end product – electricity – to consumers. CFC's loans to us enable us to provide electric power service to more than 42 million rural Americans in 47 states.

Congress explicitly recognized that end users of over-the-counter (OTC) interest rate swaps should be exempt from margining and clearing requirements. Under the DFA, Congress provided electric cooperative end users a clear exemption from the margining and clearing requirements for swaps used to mitigate our own business risks. In connection with making loans to us, CFC also uses OTC interest rate swaps to mitigate its business risks. If new requirements are imposed on CFC, the increased cost will undoubtedly be borne by our rural electric consumers in the form of higher rates.

We encourage the CFTC to "look through" CFC to its REC member-owners and clarify that, as a nonprofit lender owned and controlled by the entities exempted under the DFA, CFC is provided a clear exemption from margining and clearing requirements for the following reasons:

- CFC is a captive nonprofit cooperative created by, and wholly owned by, electric cooperatives;
- CFC is owned and controlled by its REC members on a "one member, one vote" basis;
- CFC uses swaps only to mitigate the commercial risk arising from lending to its electric cooperative members; and
- CFC never uses derivatives for speculative purposes.

We strongly urge that CFC, our wholly owned and controlled financing arm, be afforded the same exemptions as its REC member-owners from margining and clearing requirements. We appreciate your consideration of our views.

Sincerely,

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CHAPLES E BANGLE Name and Title Charles E Bangle Signature LAWE FLECTRIC COOP Co-op Name OREGON	/s	Milame Variable Varia
State	<u>-</u>	tate
Ron Viehman director Name and Title Ron Viehman Signature Morris Co-op Name Th.		Si Si Co
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Dave Stepped dwith Name and Title Dave Stepped Signature Novers Steeped Co-op Name State		St Na Si Co Sta
Name and Title BAN BUAY		Na
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Mark Snowden, CEO Name and Title Mh D. Swarn Signature Cimeron Electric Co-op Co-op Name OKlohoma State	Mike BIRD Name and Title Mute Bn D Signature CO-MO ELETRIC Co-op Name MO State
Seffyat Dir. of Com. Name and Title Signature	Name and Title Signature K. K. Thomas, CEO Name and Title
Cinarro Electric Coof Co-op Name OKlahona State	North CANCINA EMC Co-op Name North CANCINA State
Susan Flythe EVP & General My Name and Title Lusan E. Flythe Signature Cape Hatteras Electric Cooperative Co-op Name North Carolina State	Scott Hardy President/CO Name and Title Signature Cass County Electric Gosperative Inc. Co-op Name North Daksta State
Name and Title Signature Co-op Name TORIDA State	Bill Bertram-Director Name and Title Signature Coss County Elec. Co-ope Co-op Name M. D. State

REC Letter to CFTC	June 15, 2011
Gilbert MARTINEZ Name and Title Norther Riv Arriba Elec, Co-op Name NEW MEXICO State	Name and Title Signature Co-op Name Mexico State
Thomas RIVAS DIRECTOR Name and Title Signature Wetther Rio arriva Ele Co-op Name New My/CO State	Name and Title Signature
Benjamin Leyba (Executive V-P-) 6. M Name and Title Signature No elver No Co-op Name Co-op Name State	Name and Title H. Davi Roomy Signature Sunflower Electric Power Corporation Co-op Name KANSAS State
STEPHEN BONKHOUPEC Name and Title Slephen Bushland	Charles Spancer, Director Name and Title Charles Maries

Signature Signature SHER MRVAN UAUE
Co-op Name Co-op Name VERGENEA State State

Name and Title Signature	Name and Title Signature
NH Electric Corp Co-op Name New Hempshire State	Co-op Name NH State
Tim C. HERRON MANAJER Name and Title Signature	JoE/ Cudrid 6HAM Director Name and Title Signature
Mountain View Electeic Assu Co-op Name Colo RADO State	Twill Co. EPA Co-op Name M S State
Dena Lee De Lucca, VP/CFO Name and Title Nena Nel harbucca Signature	Name and Title Signature
NH Electric Cooperative Inc- Co-op Name NH State	FLORIDA KEIS Electric CO-DE Co-op Name FLORIDA State
Name and Title Signature Signature	Name and Title Keckerd W. Larlow Signature
Tipmond REMC Co-op Name Tud, An N State	TIPMONT REMC. Co-op Name TNDIANA State

Lyle O. Korver	Cleta & Cranford
Name and Title	Name and Title
July July	Signature Stevensford
Signature	Signature
North West REC	Randolph EMC Co-op Name
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Name and Title	Name and Title
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Pointe Coupee E.M.C.	CFC.
Co-op Name	Co-op Name -
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II AUNE STRATTEN	
Name and Title	Name and Title PRESIDENT/CED
Mar	Name and Title PRESIDENT/CEP
Signature	Muhul EA.
	Signature E.J.
Signature	Signature Sournean INDIANA TOWER
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APC Petter to CFTC	June 15, 2011
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Report Schwartker Svlalen Compol Name and Title Mach Signature North Carolina Edu Co-op Name North Carolina. State	Lark S. James STVP-Finance + cFi Name and Title Jawl S. James Signature NC Electric Membership Corp., Co-op Name NC State
Name and Title Name and Title Signature LZNJ County RCC Co-op Name Tow A State	DORAN DENNIS VP OF ACTG Name and Title DOTON Demis Signature PEE DEE ELECTRIC Cop Co-op Name S. CAROLINA State
Sarbara Seeley Signature Co-op Name Tri Caunty, Manyield tate Da.	Deane Berweger-Diretor of Juniar Name and Title Deane Berweger Signature Bayfield Electric Coop Co-op Name Wisconsin State

Jon R. Wissler - CFO	Lee Pork Director
Name and Title	Name and Title
Signature F. Wirth	Lee York Signature
PHGC Power	Nobles Cast Electric
Co-op Name	Co-op Name
State	M:presota
	State
Dwain Hollingsworth Name and Title	MARIC GLASS, MANage
the Holl	Name and Title Mare Tennes
Signature	Signature
Pioneer Rec	MN STATEWICE
Co-op Name	Co-op Name
Ohio	MN
State	State
Thomas J. Musick, Director of Engion Name and Title	HENRY HANSON - DIRECTOR Name and Title
Themes & Musich	Al ny Bauson
Signature >	Signature
Proneer Electric Cooperation Co-op Name	Nobles Coap Elect Co-op Name
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State	State
Paul Workman	D. K. 11. P.
Name and Title	DONALD KAUPMAN VILLE RESIDER
Paul R. Workman	Janfman_
Signature	Signature
Pioneer Elect. Cooperative	SANGRE DE CRISTO ELECTRICASSOC
Co-op Name	Co-op Name
Ohio	COLORADO
State	State

Walliam Freeman Clarke Eletric Name and Title Cooperative CEO	Francis W. Buckel, Manager
Name and Title Cognative CEO	Name and Title
William Streem	Francis W. Bulsel Signature
Clarke Electric Cooperative Co-op Name	Franklin REC Co-op Name
Towa State	Towq State
Jeanne Muntean, Gen Mgr./CEO Name and Title	GREG HENLEY, CEO Name and Title
Geanne Muntian Signature	
Arrowhead Electric Co-op. Inc.	Signature Signature
Co-op Name	Lyntegae Electric Cooperative INC.
Minnesota	Co-op Name
State	TEXAS
M + Bo 1. DD 14	State
Matt Brandrup Pres/Lto Name and Title	EARI BROWN, BOARD PRESIDENT
Will Muny	Name and Title
Signature	Cal Brown
Kural Electric Supply (001)	Signature
Co-op Name	Lyntegan Electric Cooperative, INC. Co-op Name
State	TEXAS
D 1 C 1 D	State
Dale Schaefer Name and Title	&AV BOX CFO
Dale Schaefer	Name and Title
Signature	Signature
Combett Power Coop	
Co-op Name	Lyntegan Electric Corp Co-op Name
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David Collan CEC	Mark of Park Direct
Name and Title	HARRY N. PARK, Director Name and Title
Saw Calo	Lang in thick
Signature	Signature
Blue Ridge Electric Co-of	Southern Rivers Energy
Co-op Name	Co-op Name
	GA.
State	State
Barbara Stockwell Director. Name and Title Coop Member	James T. Holloway Dinector Name and Title
Barbar Stockwell	Signature T. Holloway
Signature	Signature /
TRICO Electric Co-op Co-op Name	Co on Nome
A	Co-op Name
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1-1:4/ 37:44	
John W. Dumas, Director Name and Title	
Name and Title	David C. Talbot, Director - Treater Name and Title
Name and Title Opposition Signature	
Name and Title John William Signature Southern Zivers Energy	Name and Title Signature New Hampshire Electric Copporative
Name and Title Jeff White M Signature Southern Zivers Energy Co-op Name	Name and Title Signature
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Aigue Kocker, Controller	Dale Nije - CEO Name and Thile
Name and Title Argue Kolker	Name and Title
Signature Signature	Signature
Freeboen Nower Corperative Sevuices Co-op Name	Rural Elystric CODS-
-mN	Co-op Name
State	Lindsey, OK-
Name and Title Pres/CEO	BREUT BARON PIRECTOR Name and Title
Signature	Signature
Freeborn-Mower Cooperative Service Co-op Name	Rual tie. Coop
Minnesoty	Co-op Name Ollie
State	State
MARK KARPER, CEC Name and Title White Signature Homellanks TRI-County REC Co-op Name MICHIGAN State	CHESTER CONTE MEN. ACCIC S' Name and Title BUS. DEVEL. Signature CENTRAL ELECTRIC COOP. THE CO-op Name PENNSYLVANEA State
PAUL FOXWELL EXECUP/GEN.MGR Name and Title Foxwell Signature	Rob Shomasso - Wirecto Name and Title Bob Shomasso Signature
Co-op Name	WFSC. Co-op Name
IOWA	

Name and Title Name and Title Signature Hoorier Energy Co-op Name Judiana State	Name and Title John Grand Derleton Name and Title Signature Co-op Name Owen Electric State
MARKA. Stallons - CEO Name and Title	Alan Ahrman Director Name and Title
Signature	atte anna
Owen Electric	Signature Owen Flectic
Co-op Name	Co-op Name
State	Ken tucky State
1 0 1	i d 2 c
Name and Title	Michael Cobb Sr. VP Name and Title
ann Bond	Mellel Colf
Signature	Signature
Ouen Electrico Co-op Name,	Owen Electric Corp
Contracte.	Co-op Name Kentuckes
State	State
Tope Kinnan, director	DENNIS KRUEGER/CEO
Name and Title	Name and Title /
The Kinga	Traine and Title
Signatura Chimar	Kemi Kuen
Signature	Signature
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Co-op Name	KIWASH ELECTRIC COOP.
Owen Electric State Kentucky	Co-op Name
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Co-op Name

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Name and Title Signature Co-op Name 6A	Name and Title Signature HABERS SAM EMC Co-op Name GA
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State 6A	Alabama State
Name and Title Name and Title Signature Co-op Name GA State	Name and Title Name and Title Signature LASON FMC Co-op Name State
Sand Ford angle Director Name and Title Breedowd Which Signature	Jeremy R. Miller / Mgr. Finance i Admit Name and Title

Jeremy R. Miller / Mgr. Financi Admir Name and Title

Signature

Clark Co. MEMC

Co-op Name

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REC Letter to CFTC	June 15, 2011
Reuben B. McBride U., Name and Title Seuben SM. Bret.	Name and Title Lene Robert Laison 1 RS
Signature GRAHAM O. Electric Co-op Co-op Name	Signature 5 RAHAM C6 ELECTRICE COOP Co-op Name
State	State State
Name and Title	Name and Title
Signature / Havus	Signature Signature
TRICO ELECTRIC COOPERATIVE Co-op Name	Co-op Name Co-op Name
MARANA, ARIZONA State	State State
Name and Title Name Title	Name and Title
Signature WHITEWATER VACINY Rome	Signature Signature - Clay for Elec. Co-go
Co-op Name	Co-op Name Low
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Name and Pitle	Name and Title Micholo F. Hamms
Signature On 1 1 = D On 15	Signature
Co-op Name Towa	Co-op Name
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GARY McCune, chairmon Name and Title Say Mulline Signature Central Regrat Electric Coop Co-op Name Oklahoma State	Steven Nekov Genau Mangan Name and Title Ack Mela Signature Frontien Powen Company Co-op Name Ohto State
Herb C. Fallert, Director Name and Title Hest C. Fallert Signature Citizens Electric Corp. Co-op Name Missouri State	Jerry Laner, Pres/CRO Name and Title Signature Consolidated Elector Corporative Co-op Name Olmo State
Richard T. DeWijde Director Name and Title Ruhard D. DeMille Signature Citizens Electric Co-op Name Missburi State	State Straid Klemme Director Name and Title Livald Klemm Signature NWREC Co-op Name Ta- State
Kelly L. Kendall, Manager of Admin Name and Title Kluy L. Kendall, Manager of Admin Name and Title Kluy L. Kendall, Manager of Admin Kelly L. Kendall, Manager of Admin Signature The Frontier Power Company Co-op Name Ohlo State	Name and Title Signature Co-op Name State

RAY L. LOPEZ VICE-PROSA	folest O Dilles pir live for
Name and Title	Name and Title
Signature/	Signature Delle pa
Magic ValleyElect Coop	Signature 21 21 22 (1)
Co-op Name	Co-op Name
TENAS	N.M.
State	State
Name and Miles	Chs? DIES - DIRETOR
Name and Phile	Name and Title
Signature	Signature
Magic Valley Electric (00)	JACKSON EMC
Co-op Name	Co-op Name
E/EXGS	1 GA.
State	State
State Buten & Miller Scenetary-Treasuren Name and Title	Garry L Hintz Manager
Buhn & Mills Scenetary-Treasure Name and Title Barbar & Mills	
But Sceretary-Tremum Name and Title Balan & Mille Signature	Carry L Hintz Manager Name and Title Samuel Steats
Butin & Miller Scaretary-Treasurer Name and Title Balan & Mille Signature	Carry L Hintz Manager Name and Title Signature Signature
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But S Miller Scenetary-Trengum Name and Title Barbar & Miller Signature Magra Valley Electro Corporative Co-op Name Texas	Carry L Hintz Manager Name and Title Laugh Heats Signature Lingsbury Electric Corporative Inc
But S Miller Scenetary-Trengum Name and Title Barbar & Miller Signature Magra Valley Electro Corporative Co-op Name Texas	Carry L Hintz Manager Name and Title Samue Stank Signature Lingsbury Electric Corporative Inc. Co-op Name South Dakota State RON2/11 5. Cunningham
Major Lalley Electro Corporative Co-op Name Texas State Maleolin G. Dyen, Act see Tp. Name and Title	Carry L Hintz Manager Name and Title Samue Stank Signature Lingsbury Electric Corporative Inc. Co-op Name South Dakota State PONZIA S. Cunningham Name and Title
Maleolm G. Dyen, Act see Te.	Sarry L Hintz Manager Name and Title Saugh Steets Signature Lingsbury Electure Corporative Inc. Co-op Name South Dakota State PON2/U S. Cunningham Name and Title Paralles Carrier
Maleolm G. Dyen, Act geo Tp. Name and Title Maleolm G. Dyen, Act geo Tp. Name and Title My Deger Signature My R. Dyen.	Carry L Hintz Manager Name and Title Lingsbury Electric Corporative Inc. Co-op Name South Dakota State PONSIM 5. Cunninghom Name and Title Policies Commission Signature
Maleolm Co. Dyen Act gee To. Name and Title Mayre Valley Elector Corporative Co-op Name Texas State MALEOLM Co. Dyen, Act gee To. Name and Title My Deger Signature MY EC Co-op Name	Carry L Hintz Manager Name and Title Saugh Steaty Signature Lingsbury Electric Corporative Inc. Co-op Name South Dakota State PONZIUS S. Cunninghom Name and Title PONZIUS Conner Steam Signature Western Farmers the Coop.
Maleolm G. Dyen, Act geo Tp. Name and Title Maleolm G. Dyen, Act geo Tp. Name and Title My Deger Signature My R. Dyen.	Carry L Hintz Manager Name and Title Lingsbury Electric Corporative Inc. Co-op Name South Dakota State PONSIM 5. Cunninghom Name and Title Policies Commission Signature

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Michael w Brown Board member	CLITETON KARNET, GENERAL
Name and Title	Name and Title MANAGE
michael w Brown	I lift lami
Signature	Signature
Divie Ecalente Electric	BRA205
Co-op Name	Co-op Name
Whah	I EXAS
State	State
La Delland CEO	GENE MANRING Member
Name and Title	Name and Title
Signature	Signature
Dixie Escalante	SulPhur SPRINGS Valley ElecThic
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Name and Title	Name and Title
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Ralph Lents director Name and Title Rulph Yes	Name and Title
Signature	Jonn Wagner Signature
Farmers Elec Coop. Co-op Name	Co-op Name
State	State
ReTTY Lents director Name and Title Out Out	Vernon Gisens Director Name and Title
Belty Lents Signature	Signature
Farmers Electric Co-op Co-op Name	Co-op Name
State State	<u>Wisconsin</u> State
Steve Chandle V. P. Pinete. Name and Title Signature	Ken Cisar Director Name and Title Ken Cisar
Go-op Name	Signature Oconto Electric Cooperative Co-op Name
State	Wiscon sin State
Robert D. Merton Treas Director Name and Title Ord AM. M. H.	Byron C. Wolfe, CEO Name and Title
Signature	Signature
Co-op Name	Oconto Electric Cooperative Co-op Name
State	State

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MARVIN L. KLEIN	- AMES F. MARTIN JY DIVECTOR
Name and Title	Name and Title
Traven L. Klein	Jan & Mant J.
Signature	Signature
Harrison REC-	Countralles (oof
Co-op Name	Co-op Name
	alabama
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William 6 Farmer	Phyllis A Holt Office Manager Name and Title
Name and Title	Name and Title
- Director	Ohlli a ZhH
Signature	Signature The Holds G. Hold Signature
Co-op Name	
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Name and Title DIRECTOR	
Name and Title IN ECTOR	David Hischle Virector
// mue & Smith	Name and Title
Signature	David Mi Hackbe
COVINGTON EC	Signature
Co-op Name	Ocento Electric
ALABAMA	Co-op Name
State	Wisconsin
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ALAN J. THRASH, V. P. of Operations	
Name and Title	KEVIN SCHMIDT, MGR-FINAN
Olan J. Mrash	Name and Title
Signature	1 Wheat
•	Signature l
Co-op Name Electric Congruentive	MIDWEST ELECTRIC INC
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Name and Title Plemin Mellen Signature HOLMES - WAYNE ELECTRIC Co-op Name O HIO State	Barry Jolli FF — Director Name and Title Signature Holmes/Warne Co-op Name Ohio State
WALTER K. CROOK "PIRECTOR" Name and Title Latter K. Crook Signature Butter Co-Rund Public Power Co-op Name Nebrasha	Name and Title Danil R. Mann - Director Name and Title Danil R. Mann Signature Holmrs Wayne Co-op Name
New Caspa State	State Ohio
Darlene Stara Acctigan, Name and Title Stara Signature Rutler Public Power Dist. Co-op Name NE State	Michael J. Guidny, Gen Mgr. Name and Title Aichael J. J. J. Signature South Louisian Electric (orp Ass.) Co-op Name Louisian A State
She la Galloway F&A Super. Name and Title Signature De Ita Montrose Electric Assn. Co-op Name Co State	Norman Wallis U.P. Name and Title Mann Thwalls Signature Salman River Electric Coop Co-op Name I da ho

State

Robert D. Short CEO	Kirk A. Thompson, General Mange
Name and Title	Name and Title
Low Dele	July N Thompson
Signature	Signature Signature
Butter REC ElDorado, KS	
Co-op Name	CMS Electric Coop. Inc. Co-op Name
	i I
State	LANSAS
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Name and Title	Name and Title
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Signature	Synder Latter
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SHELBY Electric COOP	Prairie Power, Ire
Co-op Name	Co-op Name
IL 029 SHELBY	Illinois
State /	State
JOHN RICHARDS, CFO	JOSH M. SHARLEMBURGER, COO
Name and Title	Name and Title
Signature	Signature
Co-op Name	Co-op Name
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Kevio Kelso CPA	
Name and Title	Joseph D MARTIN PRESIDENT
	Name and Title
Signature Signature	Sall A Mant
	Signature
Dreyer + Kelso PC, PA	Mantan View Electric ASSN
Co-op Name	Co-op Name
KS	Co
State	State
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Co-op Name

State

	June 13, 2011
Name and Title Alden J. Flaholl Name and Title Alden J. Flaholl Signature FEM Electre Co-op Name South Oakoty State	Marsha L. Shumate, Vice President Finance Name and Title Marsha L. Shumate Marsha L. Shumate Signature Walton Electric Membership Corporation Co-op Name Georgia State
Rob Stroup Director Name and Title Signature Signature Co-op Name	Curt Rakestran - Director Name and Title Cunt Rakestran Signature Sullivan County R. R.C. Co-op Name
State	Pa. State
Rough HARTING CEO Name and Title Lingh Harting Signature Signature Co-op Name PA State	Robert Heinz-General Manage Name and Title Round A Heens Signature DAWSON Public Power District Co-op Name Yebraska State
Many Ann Hantman Waitor Name and Title Signature	Name and Title Signature Name and Title

Signature

Mountain Unio Hodue Osox.

Co-op Name

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Darlege H. Carpester Name and Title Starling Harpenter Signature Rippahannock Elec Coop Co-op Name VA	TRANK B. BOXLEN, JR. Name and Title Twent Box Box Coop. Signature Rappahamonh Zlac Coop. Co-op Name
State	State Va
RT Patel Director Name and Title Cobb EMC Signature	WILLIAM E. LAKE Name and Title DIRECTOR Signature William E. Lake
Co-op Name Georgia State	Co-op Name RAPPAHANNOCK ELECTRIC COOP, State VA.
DONALD BARNETT DIRECTOR Name and Title Whall W. Barutt Signature Cobb EMC Co-op Name GEORGIA State	Name and Title Director Signature Co-op Name KAppahannoale Eloctura Coop State A
Name and Title Acting CFO Name and Title Acting CFO Signature Kavai Island Utility Corperative Co-op Name Hawaii State	Name and Ritle Name and Ritle

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Mike Tornes-CEO	LAINE MORRILL
Name and Title	Name and Title
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Signature Platte alle Class	WHITE RIVER HILTEN ELECTEN
Platte- May Elect Co-op Name	Co-gp Name Co-GP
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16 chrip RRIMER	Lawrence J Hinz CEU
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Name and Title	Name and Title
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Co-op Name	Co-op Name Clay Electric Coop
mo.	Missouri
State	State
Konstall Davis	D. 1
Name and Title	RIUL CORDON - PRESIDENT Name and Title
Gendell Navo	Indi MAL
Signature PlAtte-Clay Elec. com.	Signature
Co-op Name	-TRI-STATE GENERATION & PRINSMISSON
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Robert J Occhi CEO Name and Title Signature Coast Electic Pur Assa Co-op Name Mississippi State	Clarence Boetteher, Director Name and Title Laulune Golffelin Signature Eau Claire Energy Cooperative Co-op Name WI State
Name and Title Signature Coast Electric Paver Co-op Name	Daniel J Fille Director Name and Title Daniel J Fille Daniel J Fille Signature Liver land Energy Co-op Co-op Name
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M.J. Goehring, GM Name and Title Marketring Signature Signature South Dakota State	South Dakota
State State State State Name and Title Must We Signature Whetstone Valley Electric Coop Co-op Name South Dekota State	Name and Title Vyrel May Merce Signature Hickman- Polton Rece Co-op Name K4.

Name and Title Signature Slipher Springs Vally EC. Co-op Name ARIZONA Willoy State	Caeser W. Husen CEO Name and Title Wild Wabe Signature Suration Sparies Valie; Elexans Co-op Name Anzzong State
ARCHE SMITH - OIRCTOR Name and Title Signature SILPHIK SPRIMS VALLEY ELECT. COOP Co-op Name AZ State	Chad Sapa - CFO Name and Title Signature Cass County Electric Cool. Co-op Name D State
Name and Title Lathy Thatcher - Director Name and Title Signature	WESLEY E. DURAN, DIRECTOR Name and Title Wesley & William Signature Signature Co-op Name OLORADO State
Dan Barrera Director Name and Title Dan Banen Signature Sulphur Springs Valley Electric Co-op Name A Z State	David Kimbell Priector Name and Title Namiel Limibell Signature Hickman - Further Cas. PECC Co-op Name Ky. State

State RettKowski. Director Name and Title Mal Rettourn: Signature INDAD Power & Light Co-op Name Washing tow State	BRUCE MARTINSON DIRECTOR Name and Title Signature Signature Signature South Driver State
Randy Ewell CEO Name and Title Signature Mt. Wheeler Power. Inc.	James S. Weimer Director Name and Title James S. Weimer Signature
Co-op Name Nevada State	Utilities Dist. Of W. Indiana Co-op Name NDIAN A State
MARK ROGEN V.P. Bd. of Dir. Name and Pille Mark L. Rogel Signature	Name and Title Nontroctor Signature
SIBUX VALLEY ENERGY Co-op Name South DAKOTA State	Southwest Rural Electric Co-op Name OKlahon a State
BRIAN L. SPARKS CEO Name and Title Drive L. Spark Signature	Patrick Scheier Name and Title Patrick Scheier Signature
U.P. W.T. Co-op Name INDIANA State	Southeastern Fledric Coop Co-op Name South Dat.

	June 15, 2011
Name and Title Signature A LOWRED PRESIDENT Name and Title	Name and Fitted Signature
Co-op Name State State	Co-op Name RANG Conyon State Electric Cooperative Assa Co-op Name State
Nicholas Royle Controller Name and Title Signature	WILLIAM V, PALMER, DIRECTOR Name and Title Signature
Sommer-Cowley Coop. Co-op Name 1C S State	Lea Co Elec Coop Co-op Name NM
Name and Title Lita Sain Signature SHMNER-COWLEY ELECTRIC CO-OP Co-op Name	State Robert a. auche Director Name and Title Lofert a Cauche Signature Les Coant F C
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Southern Rivers Energy Co-op Name GA State	Co-op Name WI State
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Michael Lindsay Director Name and Title Michael Lindsay Director Signature Parpahanock Elec Coop Co-op Name Virginia State	RICHARD H. JOHNSON DIRECTOR Name and Title Kichold N. Johnson Signature PEE DEE EMC Co-op Name NC State
Name and Title Name and Title Ory Signature Cooke County Elec Coop Co-op Name Texas State	Name and Fitte Name and Fitte Signature Pedemode: Fleet. Coop Co-op Name State
Neil J Hesse - b.M. Name and Title Vin L June Signature Coop Name TX State	her Hawkers Munger of Archy & France Name and Title Signature WiteD Electric Cooperative Co-op Name A State

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Charles Bullock Director	1
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ROBERT BOREN BOND PRESIDENT Signature Sacros River Econic Cod CHALLIS, IDAHO State DAVID ScHNeIDER AGT MAT Name and Title Signature MIDSTATE ELECTVIC Co-op Name State Tibereud, Directo Sootherstern Il Electric Co-op Name State Retzschmar president

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ALAN LESLEY - GENERAL MANAGER Name and Title	Charles Barton Name and Title?
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CO-OP Name	Signature OKIA. Electric Cos Co-op Name
TEXAS State	State
<u>EdCRAWFORD</u> - Bosel Chairnes Name and Title	C.D. Mihma
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HAWCSCK-WOOD Coop. Co-op Name	Carop Name
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George Walton / President	Kichard Johnson
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Michael W. Hastings - President i CED Name and Title William Discrete Signature Jo - Carroll Energy, Inc. (NFP) Co-op Name	Michael Bash VP+CFO Name and Title Nucleil Bash Signature Connerus Energy
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Tracy Heidenreich Pa CFO Name and Title Heidenreich Signature Jo-Carroll Energy Co-op Name	Name and Title Signature HARRISON REAC Co-op Name
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TAMES BAGLEY- CEO Name and Title Signature RACCOCN VALLEY ELECT. COOP
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ROBERT N RIDDICK DIRECTOR
Name and Title
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Signature
ROAMONE ELECTRIC
Co-op Name
NORTH CAROLINA
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Leon Pelzel Virector Name and Title	Name and Title
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Denton County Electric Cooperative Co-op Name	Signature Poulse Valley REFI Co-op Name
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Co-op Name	Whentland Electric G-cgs
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DILL RAGSDALE DIRECTOR	Jeff Wadsworth CF
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HATHYND DUKST ZWUTU VP Name and Title	ROBERT B. GASKILL, CED
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_	POUDRE VALLEY REA
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Philip E. Colvin, Sr. Control	VERNON G. MITCHELL, CFO
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Signature	Signature Ditchee
Tri-Courty Electric Cooperative	Access ENERGY COOPERATIVE
· · · · · · · · · · · · · · · · · · ·	Co-op Name
State State	Tow A State
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Name and Title	Minoel Wheatley - President REO
CARY Couropp	Name and Title
Signature	Milhael I. Wheatley
LIND CO REC	Signature Chortank Electric Cooperative
Co-op Name	Co-op Name,
LowA	Maryland
State	State
NICK J. PATEL	
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LINN CO REC	
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Marne and Title	Leroy AvayA Director Name and Title
Signature	Firmy Comay a
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Co-op Name	TRI-State G+T Co-op Name
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Wayne A. Tolander Director Name and Title Wayne A. Volander Signature Eastern Lowa Light + Power Co-op Name Lowa State	
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Drew Dobtz Name and Title Drew Dobts Signature Powder Riser Energy Co-op Name WY State	
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Richard Welsh Dirtor
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Jerry Barker BJ of Directors
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Name and Title	DAVID CRABTREE, V.P. Gen'l Counc
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Signature	Signature
GARKANE ENERGY BOR.	Desert Power
Co-op Name	Co-op Name
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A. Kent Olsen Direktor Name and Title	Name and Title Manager (Sco
a. Kent Olser	
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Moon hake Electric	Mandata Harrichan Tric
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D. Jud Redden Director Name and Title	Name and Title
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Robert Rottinghuns - Director Name and Title Robert Rottinghuns - Director Signature	LAWAR STEVENS - MGP, FINANCE Name and Title Signature
Nemaka - Mushall REC Co-op Name Kansas State	A Megheny Elekry Corperation, I ge. Co-op Name PA State
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Name and Title Peacy umas Signature Peacy umas Co-op Name State	DAVID L. POTTER CEO Name and Title Lawid J. Hen Signature THE ENERGY COOPERATIVE Co-op Name OHIO State

Name and Title Corper-Winters Pres	DAVID J. RECTENWALD, UP Name and Title
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WURECA, Cambridge Springs Co-op Name	NORTHVULSTEEN RURAL EXCEPTED Co-op Name
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Name and Title	PATTY M HEARY Name and Title
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Alvin W. Ginn - Director	ROBERT D. WAID CEDIAM
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CARROLL EMC	BANDERA ELECTRIC CO-OP
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MAX-S-GOLDIN DIRETER Name and Title	Jeff Copekind-Director Name and Title
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Peggy Bery CFO	Jordan Hymnin
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Hawkeye REC	N/A
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BOB BAUHAN CEO	James Berlel = Director
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Adams-Columbia Elec Coop Co-op Name Wisconsin State	Co-op Name WISCONSIN State
CAROLYN MOON, DIRECTOR Name and Title Chalyn Moon Signature Adams Columbia Electric Co-op Name Wiscomin	Mary Henrich's member Name and Title Marghaniche Signature Taylor Eloe Coop Co-op Name Wiscensin
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Virginia ABUCZEK, Director Name and Title	Tim Erickson, Director Name and Title
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United Power	United Power Inc.
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Jame Matthews, Name and Title Mar. Admin & name	Scott Uphold Director (ME) Name and Title
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Co-op Name Co-op Name	Coles Moultrie Elec Coop Co-op Name
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John LIVINGS Broke	TRUIN WELLS
Name and Title	Name and Title
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Dixie Electric	DIXIE FLECTRIC
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Mike Barlow	Box MOFFETT
Name and Title	Name and Title
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Defe Electric Coop	DAXFO ELECTRIC COUR
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Testy H. Zeibler 6m/cko Name and Title Signature Signature Mch. Son - Hold Flector Co-op Name Mo. State	Deborah S Gachne, Office Svc. Mgr Name and Title Deborah S Gachne, Office Svc. Mgr Name and Title Deborah S Gachne, Office Svc. Mgr Name Signature Morgan County RFA Co-op Name Colorado State
John Bloom, CEO/GM Name and Title Signature	Susie Norton Accountant Name and Title Susie Marton Signature
Co-op Name MISSOURY State	Morgan County REA Co-op Name Colorado State
Name and Title Name and Title Signature Lewis County REC Co-op Name Aissouri State	Name and Title Wendy McElvan Signature MISSOURI State
Mathry Smith office House Name and Title Thathyn Cuith Signature Macon Clectic Cooperature Co-op Name Misson (State	Name and Title Name and Title Signature TRI-COUNTY ELECTRIC Co-op Name MISSOURI State

Debra L. Robinson General	Phil Baker Internal Alta
Name and Title Manage	Name and Title
Delyn L. Kehmon	7330
Signature	Signature
Wood County EC	
Co-op Name	Sulphus springs Colley Elect Cogs
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Name and Title	DAMY SCHRIVER GM/CEO
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Signature	Signature
Intermountain REAT	TAYlor Electric Cogrerative
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Vernon Winterhof Board Member Name and Title Vernon & Hinterhof Signature	Ronald S. Cunningham Vice President Name and Title Collabor S. Curife Signature
ISWA Lakes Electric Cooperative Co-op Name	Western Farmers Electric Cooperative Co-op Name
IA	OK
State	State
Bob Thomasson General Manager Name and Title Bot Shomasson Signature Coddo Electric Cooperative Co-op Name	Larry Morris Director Name and Title Signature Cyraham County REC Co-op Name
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Gilbert Martinez Board Member Name and The Martinez Signature	Name and Title
Northern Rio Arriba REC Co-op Name	Co-op Name
N.M State	State
Name and Title Signature Pointe Coupee EMC Co-op Name	Anthony Labato Engineer Name and Title Signature San Luis Valley REC
ľ	Co-op Name
LA State	Co-op Name State

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John F. Wavd by; Corporate Services Name and Title Signature San Luis Valley REC Co-op Name CO State	Carol Lee Dugan; Director Name and Title Signature Son Lois Valley REC Co-op Name CO State
John R. Villyard; CEO Name and Title Signature San Luis Valley REC Co-op Name CO	Eleanor E. Valdez Board Member Name and Title Land E. Valdez Signature San Luis Valley REC Co-op Name
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	Ron Roddell - CEO
Name and Title	Name and Title
Signature Scott Uphoth	Signature
Scott Uphoth	Bear tooth REC
Co-op Name	Co-op Name
Ma Hoon, IL	mT
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George B Walton CEO	Debra O'Brien CFO
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Varlend Carpenter	Frank Bolly
Signature Coop Rappapannock Electric Coop	Signature of Signature of Pechain Coop Rappopularine of Electoria Coop
Co-op Name	Co-op Name
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Johnny Allgood Director	Donna Andersen-Yan Mass Director
Name and Title, Johnny Allgood	Name and Title
	Monno Andersen - Van Vess
Signature \checkmark	Signature /
Walton EMC	Mountain View Electric Assn.
Co-op Name	Co-op Name
GH.	<u>CD</u>
State	State
Name and Title	Name and Title
Steve Chanell	Savid Ramsey
	Signature Manager
Signature of muer Elect	Si-County Electure Coof
Co-op Name	Co-op Name
	Romaster, Mo.
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Name and Title	Name and Title
Jung H Street	John Bloom
Signature 6th fcho	Signature CEO/GM Lewis County ROR
Atchison fout to lecter	Lewistown, MO 63446
Co-op Name	Co-op Name
State	State
Name and Title)	Name and Title
Hausa Jaros	Vicki Kumha
Signature Controller and Acting CFO	Signature Charles Charles
Kauai Island Utility Corperative	Signature Borne Electric Cooperative,
Co-op Name	Co-op Name
o op name	Columbia, MO
State	State