

November 12, 2014

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

Dear Commissioners:

As member-owners of the National Rural Utilities Cooperative Finance Corporation (CFC), our wholly owned cooperative lender, we encourage the Commodity Futures Trading Commission (CFTC) to clarify in rulemaking that CFC is exempt from proposed margin requirements on swap transactions under the Dodd-Frank Act (DFA).

CFC is a nonprofit cooperative lender created and owned by consumer-owned and governed rural electric cooperatives. Electric cooperatives created CFC 45 years ago to bridge us to the private capital markets, and today we rely on CFC to provide us the financing necessary to deliver our end product—electricity—to more than 42 million rural Americans across 47 states.

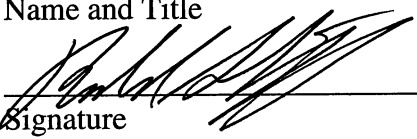
In connection with providing electric cooperatives financing to meet our credit needs, CFC uses interest rate swaps only to mitigate business risk—never for speculative purposes. When CFC engages in swaps to hedge risk, it is acting solely on the behalf of, and for the benefit of, us, its electric cooperative member-owners. Individually we are exempt from both clearing and margin requirements. However, CFC is currently exempt only from clearing requirements.

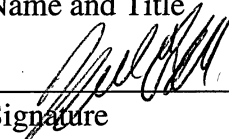
We appreciate that the CFTC recognized the unique role of cooperative lenders, such as CFC, by issuing an exemption from DFA clearing requirements (the “Cooperative Exemption”) in August 2013. However, for electric cooperatives to fully realize the benefits of this action, it is important that the CFTC take additional steps to exempt cooperative lenders from proposed margin requirements. Imposing such requirements on CFC will unnecessarily result in increased costs that will ultimately be borne by rural electric consumers.

We urge the CFTC to remain consistent in its position in support of cooperatives and issue a final rule ensuring a clear exemption for qualifying cooperative lenders like CFC from margin requirements.

We appreciate your consideration of our views.


Sincerely,

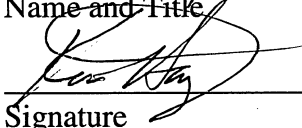
Ronald Steinhoff ^{President} Board
Name and Title

Signature
Woodbury Co REE
Co-op Name
IOWA
State

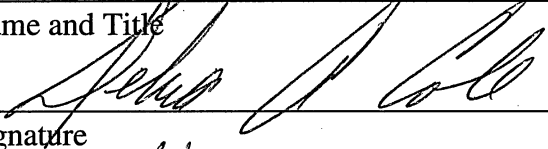
Jarred Campbell - Mgr of Administration
Name and Title

Signature
Osage Valley Electric
Co-op Name
Missouri
State

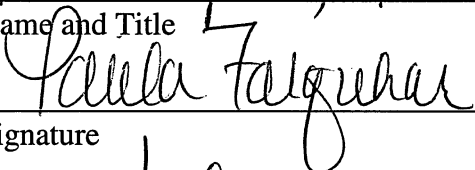
Bruce Vitosh, General Manager
Name and Title
Bruce Vitosh
Signature
Norris Public Power District
Co-op Name
Nebraska
State

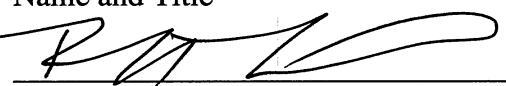
Daryl Veatch, General Manager
Name and Title
Daryl Veatch
Signature
Osage Valley Electric
Co-op Name
Os.
State Missouri

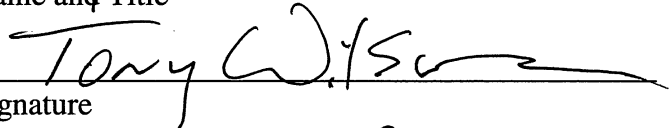
JAMEY PANKOKE, GENERAL MANAGER
Name and Title

Signature
PERENNIAL PUBLIC POWER DISTRICT
Co-op Name
NEBRASKA
State

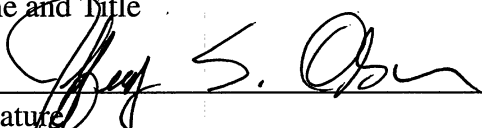
Keith Hayward General Manager/CEO
Name and Title

Signature
North East MS EPA
Co-op Name
Mississippi
State

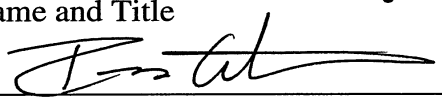
Debra A Cole CEO
Name and Title

Signature
HILCO
Co-op Name
TX
State

Paula Farquhar, Asst. General Mgr.
Name and Title

Signature
HILCO
Co-op Name
Texas
State

Bob Swinckel
Name and Title

Signature
Access Energy Coop
Co-op Name
IA
State

Tony Wilson, CFO
Name and Title

Signature
Consumers Power Inc.
Co-op Name
Oregon
State

Jeff Olson VP, Engineering
Name and Title

Signature
Pierce Pepin Coop Services
Co-op Name
WI
State

Ross Allen Manager of Engineering
Name and Title

Signature
Lynteger Electric Cooperative, Inc.
Co-op Name
Texas
State

Steve Vail, Director
Name and Title
Steve Vail
Signature
Mtn Star Connect
Co-op Name
Indiana
State

Jeff Apmon, Mgr. Industry Relations
Name and Title
Jeff Apmon
Signature
National Information Solutions Cooperative
Co-op Name
VA (home) MO (office)
State

Chad V. Jensen
Name and Title
Chad V. Jensen
Signature
Inland Power & Light
Co-op Name
WA
State

KASIA CASTRO CFO
Name and Title
Kasia Castro
Signature
Fl. Berkwap EC
Co-op Name
TX
State

O.V. SPARKS V.P. ADM & FIN
Name and Title
O.V. Sparks
Signature
NOLIN
Co-op Name
KY
State

George Hornberger Gen. Manager
Name and Title
George Hornberger
Signature
INN Electric Coop
Co-op Name
Alaska
State

LARRY MORRILL DIRECTOR
Name and Title
Larry Morrill
Signature
WHITE RIVER VALLEY EC
Co-op Name
MISSOURI
State


William R. Dodds
President / CEO
Name and Title
Wm Dodds
Signature
Spoon River Electric
Co-op Name
Illinois
State

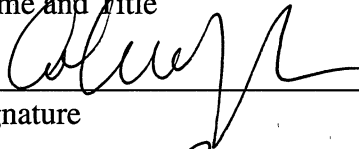
Donald A Franklund CEO
Name and Title
DONALD A FRANKLUND
Signature
MOR-GRAN-SOU
Co-op Name
ND
State

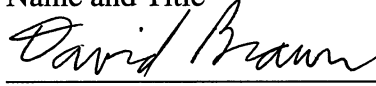
JAMES BAWLEY CEO
Name and Title
JMB
Signature
RVEC
Co-op Name
IA
State

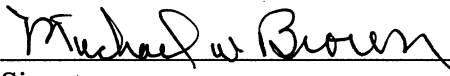
Det Short Vice President
Name and Title
Det Short
Signature
White River Valley
Co-op Name
MO.
State


STEVE WEAVER Treasury + Regulation
Name and Title
Steve Weaver
Signature
GOLDENSPAN Electric Co-op
Co-op Name
TEXAS
State


RAY D. BOX CFO
Name and Title

Signature
LYNTEGAN ELECTRIC
Co-op Name
TEXAS
State

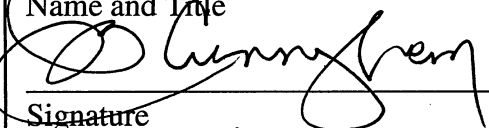
Colin Jack COO
Name and Title

Signature
Dixie Power
Co-op Name
UTAH
State

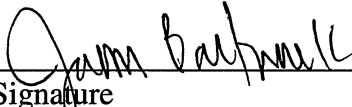
DAVID BRAUN CFO
Name and Title

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RAYBURN COUNTY ELEC. CO-OP
Co-op Name
TX
State

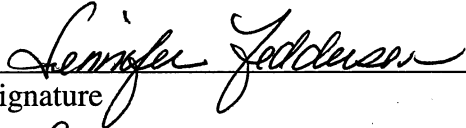
Michael W Brown Director
Name and Title

Signature
Dixie Power
Co-op Name
Utah
State

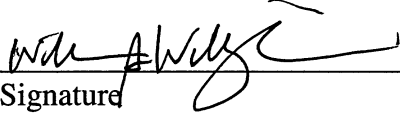
JERAD ANDERSON, PRESIDENT
Name and Title

Signature
R. WHEELER POWER
Co-op Name
NEVADA
State


Jul Redden CEO
Name and Title

Signature
Bridger Valley Electric Assoc
Co-op Name
WY
State

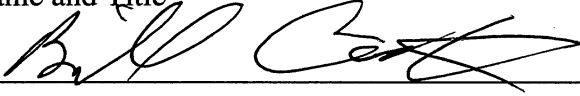
JOEL CUNNINGHAM, Director
Name and Title

Signature
Twin County EPA
Co-op Name
MISSISSIPPI
State

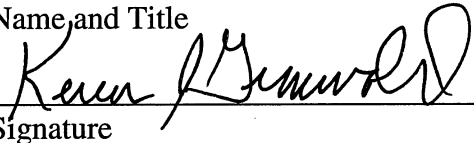
Jami Bartunek, CFO
Name and Title

Signature
Midstate Electric Coop
Co-op Name
Oregon
State


Jennifer Pedersen, Staff Assistant
Name and Title

Signature
Linn County REC
Co-op Name
IA
State

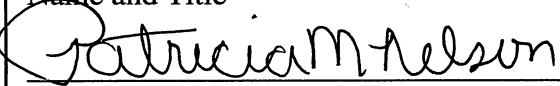
Bill Willingham, Exec. V.P. & Gen. Mgr
Name and Title

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FL Electric Coop Assn.
Co-op Name
FL
State

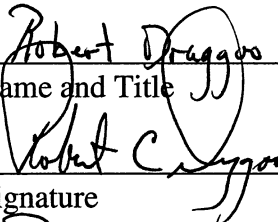
DAVID L. SENH / BOARD CHAIR
Name and Title

Signature
DO CARROLL ENERGY
Co-op Name
IL
State


Bill Cook BOARD PRESIDENT
Name and Title

Signature
White River Valley
Co-op Name
Missouri
State

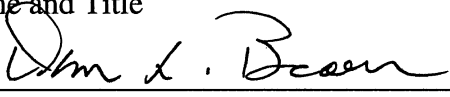
KEVEN GROENEWOLD
Exec VP & GM
Name and Title

Signature
NMRECA
Co-op Name
NM
State

Brad Janorschke, GM
Name and Title

Signature
Home Electric Assn
Co-op Name
Alaska
State

Patricia Nelson, Finance Admin Mgr
Name and Title

Signature
Taylor Electric Coop
Co-op Name
Wisconsin
State


Robert Druggoo, CFO
Name and Title

Signature
Peninsula Light Co.
Co-op Name
WA.
State

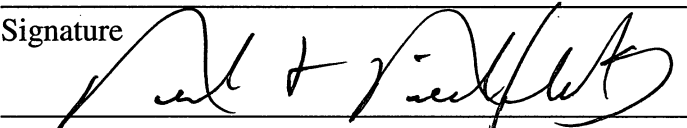
Loren H. Harts CEO
Name and Title

Signature
SAN LUIS VALLEY ROCK ELECTRIC COOP
Co-op Name
COLORADO
State

DAN L. BREWER CEO
Name and Title

Signature
CUIVRE RIVER E.C.
Co-op Name
Missouri
State

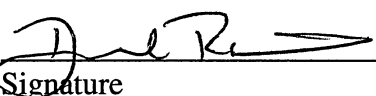
Marc Roeker, CEO
Name and Title
Marc Roeker
Signature
Laclede Electric Cooperative
Co-op Name
MO
State

ROBERT TRUESDELL / CONTROLLER
Name and Title
Robert Truesdell
Signature
LAKEVIEW LIGHT & POWER
Co-op Name
WASHINGTON
State

RAY GRINBERG, GEN MGR
Name and Title

Signature
LAKEVIEW LIGHT + POWER
Co-op Name
WA
State

NEAL F. NIEDFELDT, CEO
Name and Title

Signature
SOUTHERN PUBLIC POWER DISTRICT
Co-op Name
NEBRASKA
State

Windy K Boehm Mgr Accounting
Name and Title
Windy K Boehm
Signature
Aha Macaw Power Service
Co-op Name
Arizona
State

Durand Robison, CEO
Name and Title

Signature
Flowell Electric Assoc.
Co-op Name
Utah
State

Curtis R. Rakes-Law II
Name and Title
Curtis R. Rakes-Law II
Signature
Sullivan County
Co-op Name
Pa.
State

Joel Bullard Director
Name and Title
Joel Bullard
Signature
Boone Electric Co-op
Co-op Name
Missouri
State

Roman E. Gilman, PRESIDENT/CEO
Name and Title
Roman E. Gilman
Signature
Consumers Power, Inc.
Co-op Name
OREGON
State

Justin Sweep
Name and Title
Justin Sweep
Signature
Bridges Valley Electric Assn
Co-op Name
WY
State

Barry Hart, CEO
Name and Title
Barry Hart
Signature
Assn. of Md. Electric Co-ops
Co-op Name
MD.
State

MARTIN HILLERT CEO
Name and Title
Martin Hillert
Signature
ADAMS-COLUMBIA ELECTRIC COOP
Co-op Name
WI
State

Robert A Walker Jr
Name and Title
Robert A Walker Jr
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Upsilon Rural Electric Cooperative
Co-op Name
Texas
State

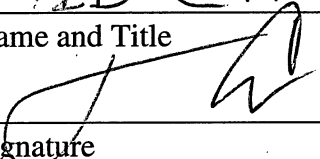
~~Robert A Walker Jr~~ MIKE CAMPBELL-Gen Mgr
Name and Title
Mike Campbell
Signature
CENTRAL FLORIDA ELECTRIC COOPERATIVE
Co-op Name
FLORIDA
State

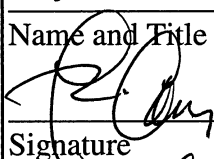
Bruce Graham, CEO
Name and Title
Bruce Graham
Signature
Kansas Electric Cooperative
Co-op Name
Kansas
State

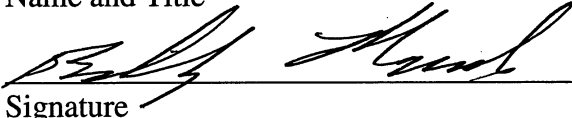
DAN MCGLENDON
Name and Title
Dan McGlendon
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GARLAND ENERGY COOPERATIVE
Co-op Name
UTAH
State

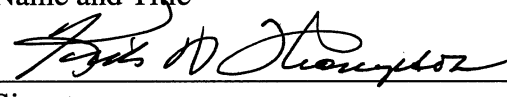
John W. Herrera GM
Name and Title
John W. Herrera
Signature
Magic Valley Electric Coop
Co-op Name
Texas
State


Cheryl Hulet, CFO
Name and Title
Cheryl Hulet
Signature
Dixie Power
Co-op Name
Utah
State

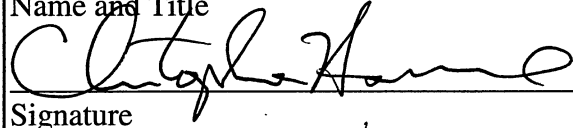
TED CASE, Exec Director
Name and Title

Signature
Oregon Rural Electric Co-op
Co-op Name
OREGON
State

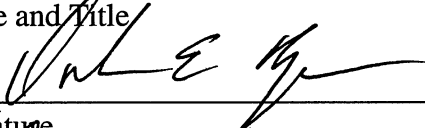
Kim R. Colberg, GM/CEO
Name and Title

Signature
Linn County REC
Co-op Name
IOWA
State


Billy Marrack
Name and Title

Signature
S&B Bernard E.C.
Co-op Name
TEXAS
State

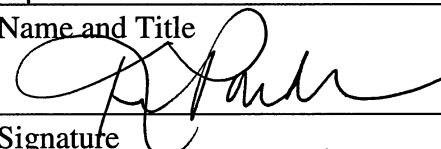
Kirk A. Thompson, General Manager
Name and Title

Signature
CMS Electric Cooperative, Inc.
Co-op Name
KANSAS
State

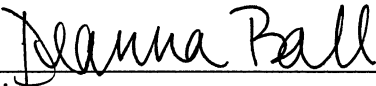
ROGER YOEDER, PRESIDENT
Name and Title

Signature
UNION REC
Co-op Name
OHIO
State

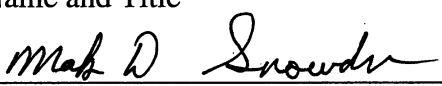
CHRISTOPHER HAMON, CEO
Name and Title

Signature
WHITE RIVER VALLEY ELECTRIC
Co-op Name
MISSOURI
State

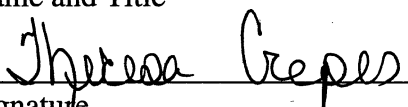
DALE NYE - CEO
Name and Title

Signature
Rural Electric Cooperative
Co-op Name
Oklahoma
State

Rose Bartholomew Finance Mgr
Name and Title

Signature
Oxdale Electric Coop
Co-op Name
WI
State

KIM PONDER - Director
Name and Title

Signature
Boone Electric Cooperative
Co-op Name
Missouri
State

Deanna Ball - Accountant
Name and Title

Signature
Pioneer REC
Co-op Name
Ohio
State

Mark Snowden - CEO
Name and Title

Signature
Cimarron Electric Co-op
Co-op Name
Oklahoma
State

Theresa Crepes CFO
Name and Title

Signature
Mid Carolina Electric
Co-op Name
SC
State

Donald T Preost CEO Gen mgr
Name and Title
Donald Preost
Signature
Lower Yellowstone BEA
Co-op Name
MONTANA
State

BEN L. FRANTZ / GEN. MGR.
Name and Title
Ben L Frantz
Signature
BARROW UTILITIES & ELECTRIC CO-OP INC
Co-op Name
ALASKA
State

Tracy Heidebrecht JP & CFO
Name and Title
Tracy Heidebrecht
Signature
Lo-Carroll Energy
Co-op Name
ILLINOIS
State

Gary Westphal CEO
Name and Title
Gary Westphal
Signature
Butler Public Power District
Co-op Name
Nebraska
State

Mike n John President/coo
Name and Title
Mike n Johnson
Signature
Climax County Electric Coop
Co-op Name
IL
State

Daniel Tillman - EVP. Finance
Name and Title
Daniel J Tillman
Signature
Valley Electric Assoc.
Co-op Name
NV.
State

Kirk Girard, DOF
Name and Title
[Signature]
Signature
Prarie Land Electric Coop
Co-op Name
Kansas
State

Craig Ecker President/CEO
Name and Title
[Signature]
Signature
Tri-County REC Pa.
Co-op Name
Pennsylvania
State

HARRY N. PARK
Name and Title
[Signature]
Signature
Southern River Energy
Co-op Name
Georgia
State

Bob Matheny President/CEO
Name and Title
[Signature]
Signature
Saguache Valley EC
Co-op Name
TX
State

Thomas L Hayes
Name and Title
[Signature]
Signature
Brown County REA
Co-op Name
Minnesota
State

Jim E COOPER CFO
Name and Title
[Signature]
Signature
COLUMBIA REA
Co-op Name
WASHINGTON
State

GLENN W. MILLER, PRESIDENT

Name and Title

Glenn W. Miller

Signature

HOLMES-WAYNE ELECTRIC

Co-op Name

OHIO

State

DON CRABBE, PRESIDENT/CEO

Name and Title

Don Crabbe

Signature

FIRST ELECTRIC COOPERATIVE

Co-op Name

ARKANSAS

State

Karen McBride Kinkead, Director

Name and Title

Karen M Kinkead

Signature

Boone

Co-op Name

~~State~~ MO.

State

Isson Brothen, Assistant General Manager

Name and Title

Isson A. Brothen

Signature

Lower Yellowstone Rural Electric

Co-op Name

Montana

State

Ray Beavers, CEO

Name and Title

Ray Beavers

Signature

United Cooperative Services

Co-op Name

TEXAS

State

Marsha L Shumate, CFO

Name and Title

Marsha L Shumate

Signature

Walton Electric Membership Corporation

Co-op Name

Georgia

State

Paul Foxwell EXEC VP/GEN. MGR.
Name and Title
Paul D. Foxwell
Signature
AWAMAKEE CLAYTON ELECTRIC COOP
Co-op Name
IOWA
State

John West CFO
Name and Title
John West
Signature
Adams Columbia Electric Co-op
Co-op Name
Wisconsin
State

Tracy Bowman Mgr. Office Serv.
Name and Title
Tracy Bowman
Signature
Lamb County Electric Coop
Co-op Name
Texas
State

DAVID BABCOCK, COO
Name and Title
David Babcock
Signature
SAM Houston EL
Co-op Name
SAM TEXAS
State

Trent Anderson
Name and Title
Trent C. Anderson
Signature
NH Electric Co-op
Co-op Name
NH
State

Todd Culligan CEO
Name and Title
Todd Culligan
Signature
BOONS Electric Cooperative
Co-op Name
MO
State

Robert Boner, Director
Name and Title
[Signature]
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SANBORN RIVER ELECTRIC
Co-op Name
IDAHO
State

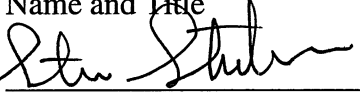
Kent Amundson, CEO
Name and Title
[Signature]
Signature
Woodbury Co. REC
Co-op Name
Iowa
State


Fred Brog, Director
Name and Title
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Lower Valley Energy
Co-op Name
Wyoming
State

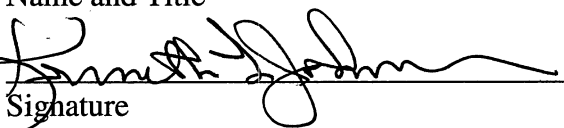
CURT ANDERSON, OFFICE MAN
Name and Title
[Signature]
Signature
NORTH WEST REC
Co-op Name
IOWA
State


Chris P Jones, Director
Name and Title
[Signature]
Signature
JACKSON EMC
Co-op Name
GA
State


Michael Preston O'Brien II
Name and Title
[Signature]
Signature
Oklahoma Electric Coop
Co-op Name
OK
State


Steve Stroschane Eng. + Opn. Mgr.
Name and Title

Signature
Polk-Burnett Electric Co-op
Co-op Name
WI
State

ROGER MEADER GM/CEO
Name and Title

Signature
COOS-Comy Electric Coop
Co-op Name
OR
State

Ken Johnson, GM/CEO
Name and Title

Signature
Co-ops Electric Coop
Co-op Name
Missouri
State

Janie Alejandre Accounting Mgr.
Name and Title

Signature
Deaf Smith Electric
Co-op Name
Texas
State

GREG HEWLEY, CEO
Name and Title

Signature
Lyntegar Electric Coop
Co-op Name
TEXAS
State

Rex Carisch, CEO
Name and Title

Signature
Calhoun County Elec Coop Assn
Co-op Name
IOWA
State

Michael Bash VP & CFO
Name and Title
Michael Bash
Signature
Connexus Energy
Co-op Name
MN
State

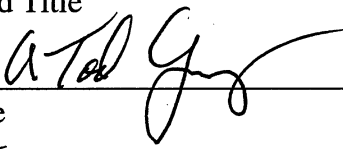
Michael Schaefer, Pres & CEO
Name and Title
Michael Schaefer
Signature
Taylor Electric Cooperative
Co-op Name
WI
State

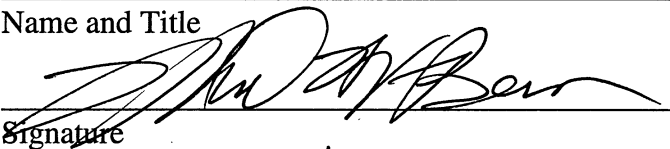
Heather Gerber, Accounting
Name and Title
Heather Gerber
Signature
Folk-Burnett Electric
Co-op Name
WI
State

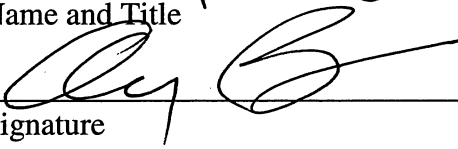
Lila A Showers VP Accounting
Name and Title
Lila A Showers
Signature
Central Wisc. Electric Coop
Co-op Name
Wisc
State

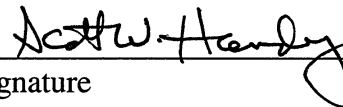
Tina Boehning, Office Mgr.
Name and Title
Tina Boehning
Signature
Bailey County Electric
Co-op Name
Dexas
State

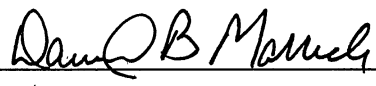
Ed Reeve, Director
Name and Title
Director Ed Reeve
Signature
TRINITY VALLEY ELECT. CO
Co-op Name
TEXAS
State


A. Todd Young
Name and Title

Signature
FLATHEAD ELECTRIC CO-OP
Co-op Name
MONTANA
State

Michael W. Bean CFO
Name and Title

Signature
Big Country Electric
Co-op Name
Texas
State

Anthony Bailey, CFO
Name and Title

Signature
Oregon Trail Electric Co-op
Co-op Name
OREGON
State

Scott W. Handy, President/CEO
Name and Title

Signature
Cass County Electric Cooperative
Co-op Name
North Dakota
State

DAVID B MARRICKLE Pres/CEO
Name and Title

Signature
Bailey County EC
Co-op Name
TX
State

WILLIAM H. WERTZ III
Name and Title

Signature
Tua County Electric
Co-op Name
OK
State

LES TEEL CEO
Name and Title
Les Teel
Signature
COLUMBIA REX
Co-op Name
WA
State

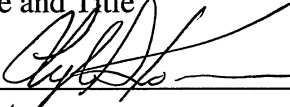
Kimberly L. Renth Member
Name and Title
Kimberly L. Renth
Signature
Clinton County Elec Co-op
Co-op Name
Illinois
State


Ryan Thomas CFO
Name and Title
Ryan Thomas
Signature
East Texas Electric Cooperative
Co-op Name
TX
State

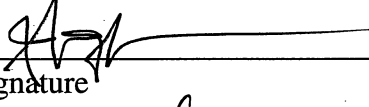
Keith Hicks director
Name and Title
Keith Hicks
Signature
Bailey Co. Electric Coop
Co-op Name
Mulhroe, TX 79347
State

Randy D. Renth Director
Name and Title
Randy D. Renth
Signature
Clinton County Electric
Co-op Name
Illinois
State

James R. Davis, 138 Men
Name and Title
Jan R Davis
Signature
Tri Co.
Co-op Name
PA
State

Lyle Korver, CEO
Name and Title

Signature
North West REC
Co-op Name
Iowa
State

John Ed SHANPAUGH ASST. GM
Name and Title

Signature
FANNING COUNTY ELEC COOP
Co-op Name
TEXAS
State

Joe Morley, Director
Name and Title

Signature
East Central Energy
Co-op Name
MN
State

Gene Stenoffson Membership Mgr
Name and Title
Gene Stenoffson
Signature
Inland Power & Light
Co-op Name
WA
State

CAROLYN MINOR V.P. DIRECTOR
Name and Title
Carolyn Minor
Signature
TRINITY VALLEY TX
Co-op Name
TX
State

Mickey Miller, President & CEO
Name and Title
Mickey Miller
Signature
NOLIN RECC
Co-op Name
KY
State

Joe Voss Director
Name and Title
Joe Voss
Signature
Clinton Co Elect Coop
Co-op Name
Iowa Ill.
State

Kendall Montgomery, General Manager / CEO
Name and Title
Kendall Montgomery
Signature
Fort Belknap Electric Coop, Inc.
Co-op Name
Texas
State

Mike Andriolo
Name and Title Engineering Manager
Mike Andriolo
Signature
Interl Power & Light
Co-op Name
Wash.
State

Allan Miller CEO
Name and Title
Allan Miller
Signature
Prairie Land Electric Coop.
Co-op Name
Kansas
State

Linden Barney CFO
Name and Title
Linden Barney
Signature
Fall River Electric
Co-op Name
Idaho
State

Carmen Hosack, Director of Finance
Name and Title
Carmen P Hosack
Signature
Nishnabotna Valley REC
Co-op Name
Iowa
State

REC Letter to CFTC
November 12, 2014

David CRABTREE

Name and Title



Signature

DESERET POWER

Co-op Name

Utah

State

Name and Title

Signature

Co-op Name

State

Name and Title

Signature

Co-op Name

State

Name and Title

Signature

Co-op Name

State

Name and Title

Signature

Co-op Name

State

Name and Title

Signature

Co-op Name

State