

February 3, 2010

HAND DELIVERED

Mr. Jeff Derouen **Executive Director** Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

FEB 0 3 2010 PUBLIC SERVICE COMMISSION

Re: PSC Case No. 2009-00476

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten redacted copies of the responses of East Kentucky Power Cooperative, Inc. ("EKPC") to the Commission Staff's First Data Request, dated January 21, 2010. An original and ten copies of EKPC's Responses to the First Set of Data Requests of Gallatin Steel, dated January 19, 2010, are also enclosed.

Also enclosed are an original and ten copies of EKPC's Petition for Confidential Treatment of Information regarding designated responses to Commission Staff's data requests, along with a copy of the designated confidential pages.

Very truly yours,

Mark David Goss & Punalt

Counsel

Enclosures

Cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN APPLICATION OF EAST KENTUCKY)POWER COOPERATIVE, INC. FOR)APPROVAL OF THE ISSUANCE OF)\$900,000,000 OF SECURED PRIVATE)CASEPLACEMENT DEBT AND UP TO \$21,435,000)OF UNSECURED DEBT)

CASE NO. 2009-00476

PETITION FOR CONFIDENTIAL TREATMENT OF INFORMATION

Comes now the petitioner, East Kentucky Power Cooperative, Inc. ("EKPC") and, as grounds for this Petition for Confidential Treatment of Information (the "Petition"), states as follows:

1. This Petition is filed in conjunction with the filing of EKPC's responses to Requests 2, 3b, and 6 contained in Commission Staff's First Data Requests dated January 21, 2010, and relates to confidential information contained in those responses that are entitled to protection pursuant to 807 KAR 5:001 Section 7 and KRS §61.878(1)(c)1, §61.878(1)(c)2a, §61.878(1)(j) and §61.878(1)(c)2c.

2. The information designated as confidential in the subject responses describes certain contract pricing information relating to the project proposed to be financed. Disclosure of such contract pricing information could arm potential future bidders with information permitting them to obtain an unfair commercial advantage over and to the substantial detriment of EKPC and its members. As such, this information is confidential and not subject to public disclosure pursuant to KRS §61.878(l)(c)1.

3. The information designated as confidential in the subject response describes anticipated interest rates and proprietary loan terms and conditions on the proposed financing. Through internal analysis, EKPC has derived the estimated interest rate and spread to U.S. Treasuries on the subject financing. EKPC plans to competitively bid the interest rate that lenders will pay on the debt. Disclosure of such an anticipated interest rate could arm lenders with information permitting them to adjust interest rates in a way so as to maximize their return, to the competitive disadvantage of EKPC and its members. As such, this information is confidential and not subject to public disclosure pursuant to KRS §61.878(1)(c)1. In addition, these proprietary loan terms and conditions are also protected under KRS §61.878 (1)(c)2a, as it is a required disclosure to an agency in conjunction with an application for a loan.

4. Preliminary recommendations in which opinions are expressed are likewise exempted from disclosure under KRS §61.878 (1) (j). The preliminary interest rate recommendations by EKPC management concern debt issues not yet publicly offered by EKPC. Because EKPC has not made a final decision regarding the precise circumstances surrounding the issuance of the debt, disclosure of this preliminary information could hinder EKPC's ability to market this private placement to lenders at a future date. Because the interest rate expectations contain preliminary recommendations expressing the opinion of EKPC management reflecting the quality of the securities, this information should be afforded confidential status, as per KRS §61.878 (1) (j).

5. The subject information is also entitled to protection pursuant to KRS 61.878(1)(c) 2 c, as records generally recognized as confidential or proprietary which are

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confidentially disclosed to an agency in conjunction with the regulation of a commercial enterprise.

6. Along with this Petition, EKPC has enclosed one copy each of the subject responses, with the confidential information identified by highlighting or other designation, and 10 copies of the same responses, with the confidential information redacted. The identified confidential information is not known outside of EKPC and is distributed within EKPC only to persons with a need to use it for business purposes. It is entitled to confidential treatment pursuant to 807 KAR 5:001 Section 7 and the various sections of KRS 61.878 delineated above.

WHEREFORE, EKPC respectfully requests the Public Service Commission to grant confidential treatment to the identified information and deny public disclosure of said information.

Respectfully submitted,

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Mark David Goss Frost Brown Todd LLC 250 West Main Street, Suite 2800 Lexington, KY 40507-1749 (859) 231-0000 – Telephone (859) 231-0011 – Facsimile Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to certify that an original and 10 copies of the foregoing Petition for Confidential Treatment of Information in the above-styled case were hand-delivered to the Office of Jeffrey Derouen, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 on February 3, 2010.

Mark Janid Goss ly Janut Counsel for East Kentucky Dower Cooperative, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN APPLICATION OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR)	
APPROVAL OF THE ISSUANCE OF)	
\$900,000,000 OF SECURED PRIVATE)	CASE NO. 2009-00476
PLACEMENT DEBT AND UP TO \$21,435,000)	
OF UNSECURED DEBT)	

RESPONSES TO COMMISSION STAFF'S FIRST DATA REQUEST TO EAST KENTUCKY POWER COOPERATIVE, INC.

DATED JANUARY 21, 2010

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN APPLICATION OF EAST KENTUCKY) **POWER COOPERATIVE, INC. FOR**) **APPROVAL OF THE ISSUANCE OF** \$900,000,000 OF SECURED PRIVATE) PLACEMENT DEBT AND UP TO \$21,435,000) **OF UNSECURED DEBT**)

)

)

CASE NO. 2009-00476

CERTIFICATE

STATE OF KENTUCKY) **COUNTY OF CLARK**

David G. Eames, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff First Data Request in the above-referenced case dated January 21, 2010, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

David G Earner Subscribed and sworn before me on this 1st day of <u>February</u>, 2010. <u>Jun M. Willoypp</u>

MY COMMISSION EXPIRES NOVEMBER 30, 2013 NOTARY ID #409352

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN APPLICATION OF EAST KENTUCKY)POWER COOPERATIVE, INC. FOR)APPROVAL OF THE ISSUANCE OF)\$900,000,000 OF SECURED PRIVATE)PLACEMENT DEBT AND UP TO \$21,435,000)OF UNSECURED DEBT)

CASE NO. 2009-00476

CERTIFICATE

STATE OF KENTUCKY)) COUNTY OF CLARK)

John R. Twitchell, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff First Data Request in the above-referenced case dated January 21, 2010, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Subscribed and sworn before me on this 2^{n} day of _____

2010.

MY COMMISSION EXPIRES NOVEMBER 30, 2013 NOTARY ID #409352 ,

COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 1RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

Request 1. Refer to Exhibits 2 and 3 of EKPC's application. Exhibit 2 indicates that, to date, project expenditures for Smith Station Unit 1 ("Smith I") have been funded from EKPC's general funds. It also indicates that proceeds from the proposed \$900 million in financing will be used to reimburse EKPC's general funds and fund yet-to-be-incurred capital expenditures. Exhibit 3, page 4 of 4, indicates the total project cost for Smith 1 is \$819.3 million.

Request 1a. Provide the amount of general funds that EKPC has expended to date on the Smith 1 project.

Response 1a. Through November 30, 2009, EKPC has expended \$146,750,496 on the Smith 1 project.

Request 1b.Explain whether the difference between the amount of generalfunds already spent on the Smith 1 project and the total project cost of \$819.3 millionshould approximate the amount of the project's yet-to-be-incurred capital expenditures.Response 1b.At the present time, it is projected that the difference between the\$146.8 million already spent on the project's yet-to-be-incurred capital expenditures.million should approximate the project's yet-to-be-incurred capital expenditures.

Request 1c.The amount of the proposed secured private placement debt is \$80million more than the Smith 1 total project cost of \$819.3 million. Explain why the levelof the proposed financing is roughly 10 percent greater than the project's total cost.

Response 1c. Because of extensive permitting delays, the date to begin construction on the Smith 1 project has had to be repeatedly rescheduled, causing increases and uncertainty in the costs for required construction contracts. Due to these uncertainties in the final project cost, EKPC has estimated a proposed financing level greater than the current expected cost. EKPC intends to fund no more than the actual cost of the project.

REDACTED

PSC Request 2 Page 1 of 2

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2009-00476 FIRST DATA REQUEST RESPONSE

COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 2RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

Request 2. Refer to Exhibit 2, page 1 of 2, of the application, which states that "[E]KPC now seeks regulatory authority for the placement of \$900 million of debt with capital markets lenders/investors." Identify all financing alternatives that EKPC will consider and describe the estimated financial impact of each different alternative.

Response 2. EKPC will consider the following financing alternatives: Private placement, 144A, and direct borrowing from National Rural Utilities Cooperative Finance Corporation ("CFC") and/or others. Generally speaking, the 144A market has a broader investor base than the traditional private placement market. As a result, 144A may result in better pricing for EKPC, but issuance costs are generally higher with a 144A offering. However, a credit rating is required in order to enter into the 144A market. Based on the current market condition, the difference in pricing between a private placement and a 144A transaction is approximately 10-15 bps. Historically, this spread can be as wide as 30 bps or as low as 0-5 bps. The indicative pricing for a private placement transaction is included in the response to Request 3(b).

REDACTED

PSC Request 2

Page 2 of 2



COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 3RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

Request 3. Refer to the application, Exhibit 2.

Request 3a. On page 1 of 2, EKPC states that it expects to issue up to \$900 million of debt in multiple private placements of \$150 to \$300 million each between 2010 and 2014. It also states that the tenor of each private placement will range from five to 35 years, depending on market conditions and lender expectations at the time of issuance and that, generally, EKPC favors using amortized fixed-rate financing for the project.

(1) Provide the projected date of each placement and explain why each date was selected.

(2) Explain in detail why EKPC favors fixed-rate financing for Smith 1.

Response 3a(1). Because of uncertainty in the date that EKPC will be able to begin construction on the Smith 1 project, EKPC has only estimated the timing for the first three placements of the requested financing. These are based on projected construction cash flows assuming a construction-start date in early 2011. The remaining placement dates will be determined once the final project schedule is determined.

- July 2010 \$175 million
- April 2011 \$200 million

REDACTED

PSC Request 3 Page 2 of 2

Response 3a(2). Fixed rate financing provides certainty of principal and interest payments for future years. EKPC considers this consistency to be an advantage in the low interest rate market which exists at the present time. EKPC believes that variable-rate financing is appropriate for a portion of its corporate debt, but believes that the potential for substantial interest rate escalation in future years on such a large portion of EKPC's debt would be unduly risky.

Request 3b. On page 2 of 2, EKPC states that it plans to issue its first private placement in the amount of \$175 million upon approval of this financing application by the Commission. Provide the estimated terms and conditions (interest rate and tenor) of this placement and describe its projected financial impact.

Response 3b.

Private Placement Indicative Pricing is reflected below:

- Facility size: \$175 million
- Security: Senior Secured



COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 4RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

Request 4. Refer to Exhibit 2, Attachment 1, of the application, which is a letter to the Chairman of EKPC's board from the Acting Administrator of the United States Department of Agriculture Rural Development ("RD") that appears to have been stamped "JUL 31, 2009" and "AUG - 6, 2009."

Request 4a. Explain whether either date stamp reflects when the letter was received by someone at EKPC.

Response 4a.July 31, 2009 is the date the letter was sent from RUS. August 6,2009 is the date that EKPC received this letter.

Request 4b.The letter states that RD has approved a lien accommodation of itsmortgage for EKPC in order to permit EKPC to finance the construction of Smith 1.Explain what purpose such a lien accommodation serves and why EKPC would seek suchan accommodation.

Response 4b. Under EKPC's RUS Mortgage, security interests can be granted to third-party lenders / capital market investors via lien accommodations. In order to provide such security to third-party lenders / capital markets investors, EKPC applied for and received a lien accommodation from RUS in an aggregate amount not to exceed \$900 million.

COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 5RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

<u>Request 5.</u> In EKPC's recent rate case, Mr. Jonathan Andrew Don, testifying for EKPC, stated that in early 2008, RD instituted a moratorium on electric cooperative loan applications related to coal-fired base load electric generation.

Request 5a. Explain whether the RD moratorium on base load generation on financing for coal-fired electric generation remains in effect.

<u>Response 5a.</u> The referenced moratorium on baseload generation remains in effect.

Request 5b. If RD will not finance coal-fired power plants but will approve a lien accommodation to assist an RD borrower like EKPC in obtaining such financing elsewhere, describe how EKPC views RD's position on the future of coal-fired electric generation.

Response 5b. EKPC does not believe it is appropriate to speculate or editorialize upon RD's position on the future of coal-fired electric generation either in Kentucky or the rest of the United States. RD has advised the Generation and Transmission Cooperative utility sector that, currently, there is a moratorium on RD providing financing for baseload resource additions. With that understanding, EKPC is pursuing

other financing alternatives for its baseload resource additions. EKPC views RD to be an integral partner to the rural electric cooperative sector and will continue to pursue financing from RD as and where appropriate. RD continues to provide financing for all other programs under its purview.

REDACTED

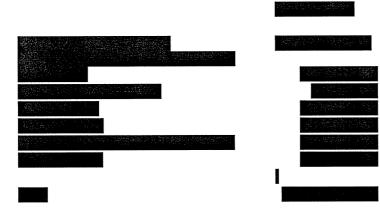
PSC Request 6 Page 1 of 1

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2009-00476 FIRST DATA REQUEST RESPONSE

COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 6RESPONSIBLE PERSON:John R. TwitchellCOMPANY:East Kentucky Power Cooperative, Inc.

Request 6.Refer to Exhibit 3, page 4 of 4, of the application. Provide adetailed breakdown of the amount identified as "Owners Cost" and a detailed descriptionof what this item represents.

Response 6.Owner's cost represents EKPC's out-of-pocket costs on theproject. A detailed breakdown of the amount identified as "Owners Cost" is provided inthe table below.



COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 7RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

Request 7.Refer to Exhibit 5 of the application, EKPC's statement ofoperations for the 12 months ending September 30, 2009. Provide, in the same format, apreliminary statement of operations (unaudited if necessary) for calendar year 2009.

Response 7.EKPC's statement of operations (unaudited) for calendar year2009, provided in the same format as Application Exhibit 5, is included on page 2 of thisresponse.

PSC Request 7

EAST KENTUCKY POWER COOPERATIVE, INC. STATEMENT OF OPERATIONS

Page 2 of 2

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	De	12 Months Ending ccember 31, 2009 (Unaudited)
ELECTRIC ENERGY REVENUES	\$	745,705,428
Other Operating Revenue and Income TOTAL OPER. REVENUE & PATRONAGE CAPITAL	\$	27,383,724 773,089,152
Operating Expense-Production-Excluding Fuel Operating Expense-Production-Fuel Operation Expense-Other Power Supply Operation Expense-Transmission Operation Expense-Distribution Operation Expense-Consumer Service & Information Operation Expense-Sales Operation Expense-Sales Operation Expense-Administrative & General TOTAL OPERATION EXPENSE	\$	58,408,578 294,840,153 105,415,279 25,519,165 751,767 1,995,650 6,101 28,654,744 515,591,438
Maintenance Expense-Production Maintenance Expense-Transmission Maintenance Expense-Distribution Maintenance Expense-General Plant TOTAL MAINTENANCE EXPENSE	\$	48,336,183 4,324,921 924,519 934,103 54,519,725
Depreciation & Amortization Expense Taxes Interest on Long-Term Debt Other Interest Expense Asset Retirement Obligations Other Deductions TOTAL COST OF ELECTRIC SERVICE	\$	60,548,674 800 113,319,764 35,780.84 - 7,207,522 751,223,704
Operating Margins Interest Income Allowance for Funds Used During Construction Other Non-operating Income - Net Other Capital Credits & Patronage Dividends		21,865,448 3,615,136 4,883,872 (59,870) 264,435 30,569,021
NET PATRONAGE CAPITAL OR MARGINS		50,507,041

COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 8RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

Request 8.Refer to Exhibit 7 of the application, which shows EKPC's long-term debt outstanding as of September 30, 2009 and its interest cost for calendar year2008.

Request 8a. Provide, in the same format as Exhibit 7, a schedule which shows EKPC's interest cost for calendar year 2009.

Response 8a. Please see pages 3 through 9 of this response.

Request 8b. Provide, in the same format as Exhibit 7, a schedule which, based on its current outstanding long-term debt, shows EKPC's projected interest cost for calendar year 2010.

Response 8b. Please see pages 3 through 9 of this response.

Request 8c.Provide EKPC's projected annualized interest cost for calendaryear 2011 assuming the proposed financing is approved by the Commission. Indicate allassumptions made in deriving the 2011 projection.

Response 8c. EKPC's projected interest cost for calendar year 2011 is \$165,829,713.00. This projected interest expense assumes that private placement debt related to the construction of the Smith 1 project is issued as delineated in the response to

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Request 3. Approximately \$477 million of FFB debt is also expected to be issued at various times during the 2010-2011 time period at interest rates of 4.50% - 5.00%.

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<u>Bonds</u> Type of Debt Issue	Amount Outstanding <u>12/31/2009</u>	Projected Amount Outstanding 12/31/2010	Amount <u>Issued</u>	Issuer	Date <u>Issued</u>	Face Value	Coupon Interest <u>Rate</u>	Date of <u>Maturity</u>	Interest 2009	Projected Interest <u>2010</u>
Spurlock Pollution Control Bonds	58,200,000.00	48,500,000.00	141,300,000.00	County of Mason	11/15/1984	67,000,000.00	Variable	10-15-2014	722,246.10 \$	1,687,798.00
Smith Pollution Control Bonds	7,625,000.00	3,300,000.00	59,650,000.00	County of Clark	11/15/1984	11,535,000.00	Variable	10-15-2014	369,890.51 \$	100,857.00
Cooper Solid Waste Disposal Bonds	7,700,000.00	7,300,000.00	11,800,000.00	County of Pulaski	12/15/1993	7,700,000.00 Variable	Variable	08-15-2023	276,093.76 \$	228,906.00
	73,525,000.00	59,100,000.00							1,368,230.37 \$	2,017,561.00

PSC Request 8 a, b Page 3 of 9

<u>Notes</u> Type of Debt Issue	Date of <u>Issue</u>	Date of <u>Maturity</u>	Amount Outstanding <u>12/31/2009</u>	Projected Amount Outstanding <u>12/31/2010</u>	Amount <u>Issued</u>	Coupon Interest <u>Rate</u>	Interest 2009	Projected Interest <u>2010</u>
National Rural Utilities Cooperative Finance Corporation ("CFC")	orporation ("CFC")							
CFC # 9001 CFC # 9033 CFC # 9034 CFC # 9038	08-20-1974 08-29-1984 06-12-1995 03-02-1998	02-28-2014 05-31-2019 11-30-2024 02-28-2024	3,344,241.12 4,039,105.83 4,980,806.15 3,901,672.78	2,613,818.12 3,682,913.83 4,765,886.15 3,719,788.78	13,150,000.00 8,530,000.00 6,734,000.00 5,251,000.00	4.950% 4.950% 5.000% 4.550%	191,238.51 216,542.61 232,254.23 182,254.58	174,379.00 222,096.00 245,052.00 191,708.00
CFC - Unsecured Credit Facility - #5101	9/2005-12/2009	09-02-2010	325,000,000.00	325,000,000.00	650,000,000.00	Var.	11,886,847.24	9,441,689.00
CFC - CT Bridge Loan - #9050 CFC - CT Bridge Loan - #9049	08-12-2008 08-12-2008	5/31/2010 5/31/2010	, ,			4.900% 5.880%	4,604,794.50 939,528.37	
Clean Renewable Energy Bonds	02-06-2008	12/1/2023	7,536,416.88	6,998,100.88	ı	0.400%	26,623.93	26,568.00
National Cooperative Services	07-18-1995	09-29-2006	4,500,000.00	3,000,000.00	18,000,000.00	7.700%	457,187.50	346,500.00
Corporation		Total CFC	353,302,242.76	349,780,507.76	701,665,000.00	Ι	18,737,271.47	10,647,992.00
Rural Utilities Service Notes								
K4-14530	06-02-1975	06-02-2010	157,868.25	0.00	5,000,000.00	5.000%	15,919.88	3,034.63
K4-14540	06-01-1976	06-02-2011	545,076.02	189,287.37	6,000,000.00	5.000%	50,418.40	20,043.00 44.001.40
K4-14570	06-01-1977	07-01-2012	1,028,461.36	633,350.01	7,000,000,00	2.000%	01,240,10	44,001.40 60.407.51
K4-14580	03-01-1978	03-01-2013	1,355,270.83	90.000,406	00.000,002,1	0/000 S	82.020,11	60 144 94
M9-14590	10-31-1979	10-31-2014	51.106,064,1	740,280.08	1 526 705 78	2/000/5	73 167 91	19 575 43
M9-14591	10-31-1979	10-31-2014	421,631.13	340,604.68	192.00/,020,1	5 000%	1 681 57	1210.18
SRDA 14610	03-01-1977	03-01-2012	105.451,82	CE.CZC,/1	6 401 000 00	5 000%	155,770,24	143.441.00
P12-1-B620	08-29-1984	06-30-2019	11.100,400,111	1 341 913 00	3 053 000 00	5 000%	76.466.89	70,451.00
1797-1-714	08-29-1904 08-20-1000	08-31-2021	4 374 363 50	4.085.600.00	7.598.272.97	5.000%	225,519,42	210,390.00
F12-1-D024 D12_1_R675	08-20-1990	08-31-2022	1.121.380.04	1.049.778.00	1,855,727.03	5.000%	57,753.89	53,994.00
R 1 2 - 1 - B642	03-31-1995	12-31-2024	5,851,570.59	5,691,830.00	7,856,000.00	5.000%	300,039.98	292,000.00
R12-1-B647	03-31-1995	12-31-2024	5,851,570.59	5,691,830.00	7,856,000.00	5.000%	300,039.98	292,000.00
T62-1-B650	03-02-1998	12-31-2024	4,653,773.81	4,423,817.00	6,125,500.00	5.125%	244,562.48	233,102.00
T62-1-B655	03-02-1998	12-31-2024	4,653,773.81	4,423,817.00	6,125,500.00	5.125%	244,562.48	233,102.00
		Total RUS	35,984,083.02	32,784,845.35	79,530,718.00	I	1,904,065.50	1,746,663.05
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PSC Request 8 a, b

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Projected Interest <u>2010</u>	6 Jo S as a second seco
Interest 2009	231,420.13 24,521.18 28,572.61 33,425.46 84,989.19 73,015.48 58,795.94 58,795.94 58,795.94 40,121.75 54,831.06 79,166.02 304,335.19 308,066.42 149,600.29 104,281.02 149,600.29 104,281.02 149,600.29 104,281.02 106,795.45 176,120.96 279,174.48 290,022.73 98,821.57 182,846.03 132,788.39 290,022.73 99,88.19 14,858.44 153,942.41 9,948.19 14,858.44 16,091.60 196,489.65 16,580.25 292,470.80 16,663.74
Coupon Interest <u>Rate</u>	5.452% 5.452% 5.452% 5.452% 5.452% 5.452% 5.452% 5.452% 5.452% 5.452% 5.452% 5.452% 5.4544% 7.444% 7.444% 7.4444% 7.4444% 7.4444% 7.470% 6.248% 6.2591% 6.2591% 6.2591%
Amount <u>Issued</u>	23,603,000.00 2,494,000.00 3,494,000.00 3,490,000.00 3,400,000.00 5,950,000.00 5,897,000.00 4,038,000.00 4,038,000.00 4,738,193,193,19 5,782,000.00 4,738,193,193,19 5,782,000.00 5,782,000.00 5,782,000.00 5,790,000.00 5,90,000.00 5,
Projected Amount Outstanding <u>12/31/2010</u>	$\begin{array}{c} 1,705,338,00\\ 180,665,00\\ 941,388,00\\ 246,280,00\\ 626,305,00\\ 538,105,00\\ 538,105,00\\ 538,100\\ 538,100\\ 357,438,00\\ 367,438,00\\ 367,438,00\\ 367,438,00\\ 367,438,00\\ 367,438,00\\ 367,438,00\\ 367,438,00\\ 367,438,00\\ 1,184,895,00\\ 1,184,895,00\\ 1,184,895,00\\ 1,184,895,00\\ 1,184,895,00\\ 1,184,895,00\\ 1,184,895,00\\ 1,184,895,00\\ 1,256,329,00\\ 2,324,742,00\\ 1,256,329,00\\ 2,324,742,00\\ 1,256,329,00\\ 2,325,500\\ 1,046,753,00\\ 2,019,650,$
Amount Outstanding <u>12/31/2009</u>	3,293,693.05 3,293,693.34 406,660.21 475,728,63 1,209,610.83 1,209,610.83 1,209,610.83 1,209,610.83 1,039,194,69 836,882,90 836,885,90 4,573,0836,91 1,702,775,88 2,944,362,19 1,702,767,30 1,186,938,26 2,777,434,66 3,494,039,18 1,459,687,19 2,790,586,89 1,19,850,51 1,961,402,49 2,981,068,71 579,926,32 2,944,362,19 1,961,402,49 2,981,068,71 579,926,32 1,961,402,49 2,981,068,71 579,926,32 1,19,850,51 1,20,550,51 1,20,550,50 2,205,192,87 2,205,192,87 2,205,192,87 2,205,192,87 2,205,51,93 2,790,586,89 1,19,850,51 1,20,550,51 1,20,550,50 1,20,550
Date of <u>Maturity</u>	12-31-2011 12-31-2011 12-31-2011 12-31-2011 12-31-2011 12-31-2011 12-31-2011 12-31-2011 12-31-2011 12-31-2011 12-31-2012 12-31-2015
Date of <u>Issue</u>	03-04-1977 04-08-1977 04-25-1977 05-25-1977 05-25-1977 05-25-1977 07-25-1977 09-30-1977 09-30-1977 11-28-1977 03-01-1978 08-24-1978 08-24-1978 08-24-1978 08-24-1978 08-24-1978 08-24-1978 08-24-1978 08-24-1978 08-24-1978 08-25-1979 01-15-1981 05-15-1981 07-20-1981 07-20-1981 01-15-1981 01-15-1981 01-15-1981 01-15-1981 01-15-1981 01-15-1982 02-17-1982 01-12-1982 01-12-1982 01-12-1982 01-12-1982 01-12-1982 01-12-1982 01-22-1982 01-12-1982 01-12-1982 01-22-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-17-1982 02-12-1982
<u>Notes</u> Type of Debt Issue	Federal Financing Bank NotesHO-010HO-015HO-025HO-030HO-045HO-045HO-056HO-055HO-055HO-056HO-056HO-055HO-056HO-070HO-070HO-070HO-070HO-070HO-111HO-070HO-121HO-121HO-121HO-121HO-225HO-226HO-225HO-226HO-225HO-225HO-226HO-225HO-225HO-235HO-235HO-235HO-235HO-235HO-235HO-235HO-235HO-235HO-235HO-235HO-235HO-315HO-3305

Notes

Projected Interest 21,066.00 11,290.00 151,277.00 221,066.00 151,277.00 254,493.00 254,493.00 254,493.00 254,493.00 254,493.00 254,493.00 254,493.00 254,493.00 254,493.00 254,493.00 254,493.00 253,3812.00 154,751.00 253,3812.00 153,749.00 154,751.00 223,8450.00 253,3812.00 135,749.00 135,749.00 135,749.00 135,749.00 135,749.00 135,749.00 135,749.00 228,542.00 2
Interest 23,148,43 23,148,43 12,400.97 166,197.30 290,780,66 290,780,66 290,780,66 25,5697.00 37,535.04 170,015.98 37,555.697.00 37,555.697.00 37,555.697.00 37,555.697.00 37,555.697.00 37,555.697.00 37,555.697.00 37,555.697.00 37,555.697.00 25,471.39 32,556.03 37,651.12 25,471.39 37,651.12 25,506.977 31,613.96 31,122.82 31
Coupon Interest 7.991% 7.991% 7.991% 7.991% 7.991% 7.991% 7.991% 7.991% 7.991% 5.913%
Amount Issued 560,000.00 560,000.00 560,000.00 7,000,000.00 1,570,000.00 6,131,000.00 1,570,000.00 1,570,000.00 1,570,000.00 1,200,000.00 1,400,000.00 1,400,000.00 1,400,000.00 1,400,000.00 1,400,000.00 1,400,000.00 1,400,000.00 1,400,000.00 1,400,000.00 1,200,000.00 1,400,000.00 1,200,000.00 1,000,000 1,000,000.00 1,000,0000.00 1,000,000,000 1,000,0
Projected Amount Outstanding 12/31/2010 242,766.00 1,743,389.00 3,050,268.00 6,882,582.00 3,956,7240 1,743,389.00 3,957,7200 1,743,389.00 3,956,1744,00 2,682,324,00 3,956,1744,00 2,113,640,00 3,956,1744,00 2,129,899,00 2,129,899,00 2,129,899,00 2,129,899,00 3,112,072,00 1,107,616,00 2,213,308,00 2,129,899,00 3,112,072,00 1,107,616,00 2,129,899,00 3,112,072,00 1,107,616,00 3,112,072,00 1,107,616,00 3,112,072,00 1,107,616,00 3,112,072,00 1,107,616,00 3,112,072,00 1,107,616,00 3,112,072,00 1,107,616,00 3,112,072,00 1,044,530,000 2,74,007,000 1,044,530,000 1,0
Amount Outstanding 12/31/2009 272,13923 145,789,35 1,953,861,39 3,418,497.60 7,66,014,51 95,1223,861,39 3,066,044,51 441,272,36 294,772,36 294,772,58 3,398,066,84 588,579,87 294,66,613,31 342,659,66 3,191,768,90 1,228,836,21 245,550,46 3,191,768,90 1,228,836,21 245,550,46 3,191,768,90 1,228,836,21 345,259,82 3,457,25 496,777,25 9,088,949,74 3,457,32 496,777,25 9,088,949,74 3,457,59 1,120,023,03 1,120,023,03 3,15,405,97 1,120,023,03 3,15,405,97 1,120,023,03 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97 3,15,405,97
Date of Maturity 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2016 12-31-2017
Date of Issue 04-19-1982 05-17-1982 05-17-1982 05-17-1982 05-17-1982 05-17-1982 07-14-1982 07-14-1982 07-14-1982 07-14-1982 09-15-1982 09-15-1982 09-15-1983 09-15-1983 09-15-1983 01-17-1983 01-17-1983 01-17-1983 02-14+1983 02-14+1983 03-16-1983 03-16-1983 03-16-1985 05-20-1985 05-21-1985 05
$\begin{array}{c} Type \ of \ Debt \ Issue \\ HO-335 \\ HO-335 \\ HO-335 \\ HO-335 \\ HO-346 \\ HO-356 \\ HO-356 \\ HO-356 \\ HO-356 \\ HO-356 \\ HO-400 \\ HO-405 \\ HO-410 \\ HO-410 \\ HO-410 \\ HO-410 \\ HO-405 \\ HO-410 \\ HO-410 \\ HO-405 \\ HO-400 \\ HO-400 \\ HO-400 \\ HO-456 \\ HO-400 \\ HO-456 \\ HO-400 \\ HO-456 \\ HO-400 \\ HO-456 \\ HO-400 \\ HO-510 \\ HO-510 \\ HO-510 \\ HO-535 \\ HO-540 \\ HO-550 \\ HO-55$

Projected Interest 2010 5.622.00 5
Interest 2009 5,952.84 2,009 5,952.84 2,009 160,852.87 19,117.77 1,341,117.77 1,355,052 3,359,533.39 3,532,566 1,105,699,85 1,105,802,39 1,105,699,85 1,105,802,39 1,105,699,85 1,105,802,39 1,105,699,85 1,105,802,39 1,105,699,85 1,105,802,39 1,105,802,39 1,105,802,39 1,105,802,39 1,105,802,39 1,105,699,85 1,105,802,39 1,105,802,102 1,105,802,102 1,105,802,102 1,105,802,102 1
Coupon Interest 5.177% 5.177% 5.177% 5.177% 6.306% 6.306% 6.306% 6.306% 6.2306% 6.123% 6.123% 6.123% 6.123% 6.005% 5.451% 5.458% 5.451% 5.456% 4.7177% 4.5109% 5.726% 5.444% 4.5758% 5.678% 5.729% 5.149% 4.577% 4.577% 4.577% 4.577% 4.577% 5.149% 5.149% 5.149% 5.149% 5.149% 5.149%
Amount Issued 1ssued 706,000.00 706,000.00 5,035,000.00 5,035,000.00 5,035,000.00 5,035,000.00 5,035,000.00 5,836,000.00 5,836,000.00 5,836,000.00 5,836,000.00 5,836,000.00 5,836,000.00 5,836,000.00 5,836,000.00 6,500,000.00 11,000,000.00 5,836,000.00 5,836,000.00 5,836,000.00 5,836,000.00 6,500,000.00 13,357,000.00 6,500,000.00 25,000,000.000.00 25,000,000.00 25,000,000.00 25,000,000.00 25,000,000.000.00 25,000,000.000.0000.00 25,000,000.000.0000.0000.0000.0000.0000.
Projected Amount Outstanding 12/31/2010 12/31/2010 2/46,148.00 1,370,022,0991.00 2,48,044.00 9,939,677.00 19,911,265.00 19,911,265.00 19,911,265.00 4,498,508.00 6,073,882.00 6,073,882.00 6,073,882.00 6,073,882.00 6,073,882.00 6,073,882.00 6,073,882.00 6,073,882.00 6,073,882.00 6,073,882.00 7,678,500.00 11,498,533.00 7,677,445.00 5,063,616.00 11,492,710.00 7,677,445.00 2,157,514.00 2,157,500 2,157,514.00 2,157,514.00 2,157,514.00 2,157,514.00 2,157,514.00 2,157,500 2,1
Amount Outstanding 12/31/2009 110,439,61 284,271.17 1,469,043.58 2,984,210.11 10,414,747.89 20,762,602.82 4,226,718.01 2,599,539,21 4,698,085,12 5,145,421.79 7,452,139,27 6,311,689,63 6,324,186,48 8,510,017.60 11,968,491.09 7,980,596.37 12,061,341.12 8,025,772.30 11,968,491.09 7,980,596.37 12,061,341.12 8,025,772.30 11,968,491.09 7,980,596.37 12,061,341.12 8,025,772.30 11,968,491.09 7,980,596.37 12,061,341.12 8,025,772.30 11,968,491.09 7,980,596.37 12,055,574.61 22,552,459.83 22,416,490.13 3,177,072.89 2,744,804.18 22,552,459.83 2,744,804.18 2,754,695.67 2,744,804.18 2,754,695.67 2,744,804.18 2,754,695.67 2,744,804.18 2,754,692.56 2,741,970.75 3,417,072.89 2,764,160.13 2,754,695.67 2,744,804.18 2,754,692.56 2,741,970.75 2,744,804.18 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,744,804.18 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,741,970.75 2,754,692.56 2,774,16 2,774,16 2,777,10 2,754,692.55 2,774,16 2,774,16 2,777,10 2,754,692.56 2,741,970.75 2,774,16 2,774,16 2,774,16 2,775,19 2,754,692.56 2,774,16 2,774,16 2,775,10 2,755,57 2,774,10 2,755,57 2,774,10 2,755,57 2,774,10 2,755,57 2,774,10 2,755,57 2,774,10 2,755,57 2,775,10 2,755,57 2,777,10 2,755,57 2,776,10 2,755,57 2,777,10 2,755,57 2,777,10 2,755,57 2,777,10 2,755,57 2,777,10 2,755,57 2,777,10 2,755,57 2,774,10 2,775,59 2,774,10 2,775,59 2,775,59 2,775,59 2,775,50 2,77
Date of Maturity [2-31-2020 [2-31-2020 [2-31-2020 [2-31-2020 [2-31-2020 [2-31-2020 [2-31-2020 [2-31-2024 [2-31-2022 [2-31
Date of Issue 04-16-1986 04-16-1986 04-16-1986 10-14-1986 11-06-1995 11-06-1995 11-06-1995 11-06-1995 01-26-1995 01-26-1995 01-126-1995 01-26-1995 01-126-1995 02-11-2001 02-11-2001 02-11-2001 02-12-2002 02-27-2003 01-15-2002 02-27-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-15-2003 01-25-2003 01-15-2003
Type of Debt IssueHO-555HO-556HO-556HO-570HO-570HO-585HO-586HO-607HO-607HO-610HO-612HO-610HO-633HO-640HO-640HO-650HO-650HO-650HO-657HO-690HO-690HO-700HO-710HO-725HO-726HO-726HO-756HO-756HO-756HO-756HO-756HO-756HO-760HO-756HO-756HO-756HO-770HO-756HO-770HO-756HO-770HO-756HO-770HO-756HO-770

Notes

Projected Interest 275,857.00 104,778.00 104,778.00 104,778.00 104,778.00 1137,596.00 276,645.00 137,596.00 271,140.00 2,240,294.00 1,110,418.00 1,110,418.00 1,110,418.00 1,110,418.00 1,110,418.00 1,117,596.00 1,117,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,843.00 22,315,148.00 1,177,845.00 1,178,950.00 1,177,845.00 1,178,950.00 1,1778,950.00 1,178,950.00 1,178,950.00 1,1778,950.00 1,178,950.00 1,1778,950.00 1
Interest 2009 281,313.90 106,712.63 174,867.01 749,319.18 282,290.64 140,345,44 219,414,77 219,414,77 2299,044,44 219,414,77 2299,044,44 235,793,60 779,265,54 496,557.85 1,119,713.36 1,108,049,31 1,108,049,31 1,108,049,31 1,108,049,31 1,108,049,31 1,108,049,31 1,108,046,03 3321,667,70 2,33,722,94 1,1092,886.65 2,317,722,93 1,117,519,13 2,296,229,49 2,404,202.59 1,117,519,13 2,296,229,49 1,117,519,13 2,296,229,49 1,117,519,13 2,296,229,49 1,117,519,13 2,296,229,49 1,1185,354.66 1,185,354.66 1,185,354.66
Coupon Interest <u>Rate</u> 5.240% 5.2240% 5.2240% 4.921% 4.577% 4.577% 4.577% 4.577% 4.577% 4.577% 4.577% 4.577% 4.757% 4.757% 4.756%
Amount Issued (5500,000.00 (5,500,000.00 (5,500,000.00 (5,500,000.00 (5,500,000.00 (5,500,000.00 (5,700,000.00 (5,644,000.00 (5,644,000.00 (5,644,000.00 (5,644,000.00 (5,644,000.00 (5,644,000.00 (5,644,000.00 (5,644,000.00 (5,644,000.00 (5,600,000.00 (5,600,000.00 (5,000,000.00 (0,
Projected Amount Outstanding 5,538,047,00 5,558,047,00 1,950,154,00 3,233,973,00 14,555,896,00 5,767,821,00 2,795,954,00 4,438,136,00 46,494,501,00 2,795,954,00 46,494,501,00 23,155,278,00 23,170,516,00 23,170,516,00 23,170,516,00 23,170,516,00 23,170,516,00 23,170,516,00 23,175,373,00 10,464,514,00 23,175,570,00 48,773,373,00 24,173,647,00 19,464,327,00 10,266,330,00 10,266,330,00 10,627,645,00 10,266,330,00 10,266,330,00 10,266,330,00 10,266,330,00 10,266,330,00 10,266,330,00 10,266,330,00 10,266,330,00 10,266,330,00 24,377,527,00 19,464,327,00 19,465,647,00 19,465,647,00 19,465,647,00 19,465,647,00 19,465,647,00 19,465,647,00 19,465,647,00 19,465,647,00 10,266,331,992,00 24,37
Amount Outstanding 5,698,800.33 5,698,800.33 5,698,800.33 5,698,800.33 2,004,119,37 3,389,959,14 14,974,995,05 5,593,057,06 2,877,713,33 4,713,33 4,713,33 4,713,33 4,713,33 4,714,513,95 4,713,33 4,714,995,065 3,301,393,25 1,882,644,85 4,84,203,72 2,35,49,501,99 23,561,707,32 23,462,736,49 17,830,023,07 11,055,021,99 23,564,85 23,561,707,32 23,564,85 23,564,99 23,564,85 23,564,99 24,737,723,51 49,466,346,99 24,736,057,77 10,795,793,16 10,794,067,77 10,795,793,16 10,794,067,77 10,795,793,16 10,794,067,77 10,774,067,77 10,795,793,16 10,774,067,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,77 10,774,057,777 10,774,057,77 10,774,057,777 10,774,057,777 10,774,057,777 10,774,057,777 10,774,057,777 10,774,057,777 10,774,057,777 10,774,057,777 10,774,057,777 10,774,057,777 10,7777 10,7774,057,777 10,7774,057,777 10,77777 10,77777 10,77777 10,7777777777
Date of Maturity 12-31-2030 [2-31-2030] [2-31-2040] [2
Date of Lasue 1ssue 02-05-2004 05-06-2004 05-06-2004 05-06-2004 05-06-2004 05-06-2004 11-16-2004 11-16-2004 11-16-2004 11-16-2005 06-07-2005 06-07-2005 06-07-2005 08-19-2005 08-29-2006 08-29-2006 08-29-2006 08-29-2006 08-29-2006 08-29-2006 08-29-2006 08-29-2006 08-19-2007 11-09-2005 08-19-2007 11-09-2005 08-29-2006 09-10-2007 11-10-2007 11-10-2007 01-09-2006 03-16-2007 01-09-2008 01-09-2
Type of Debt IssueHO-775HO-775HO-775HO-775HO-785HO-785HO-785HO-785HO-796HO-805HO-810HO-815HO-810HO-825HO-835HO-845HO-835HO-845HO-846HO-846HO-846HO-846HO-846HO-846HO-846HO-845HO-846HO-845HO-845HO-845HO-846HO-845HO-846HO-846HO-846HO-846HO-846HO-846HO-846HO-846HO-846HO-846HO-940FO

<u>ntes</u>			Amount	Projected Amount		Coupon		Projected
	Date of	Date of	Outstanding	Outstanding	Amount	Interest	Interest	Interest
<u>Type of Debt Issue</u> FO-995	<u>1ssue</u> 06-04-2008	<u>Maturity</u> 12-31-2040	24.731.869.84	<u>24,363,816.00</u>	<u>25,000,000.00</u>	<u>Kate</u> 4.623%	1,152,613.34	$\frac{2010}{1,146,003.00}$
FO-1000	10-14-2008	12-31-2040	7,809,773.35	7,686,114.00	7,900,000.00	4.298%	338,561.61	336,325.00
HO-1005	10-14-2008	12-31-2032	4,095,878.16	3,988,718.00	4,200,000.00	4.306%	179,156.58	176,023.00
FO-1010	11-07-2008	12-31-2040	24,717,149,48	24,329,390.00	25,000,000,000	4.34/%	06 121 900 1	1,0/0,020.00
FO-1015	11-10-2008	12-31-2040	7 280 216 40	24,330,730.00 7 138 858 00	7 400 000 00	0% CU +. +	200 810 50	207 496 00
1070 IU20	03-17-2000	12-31-2040	3 566 400 25	3 497 110 00	3 612 000 00	3 801%	108.316.26	135.643.00
FO-1030	04-16-2009	12-31-2030	24.639.475.75	24.199.354.00	25.000.000.00	3.651%	644,002.54	900,687.00
FO-1035	05-15-2009	12-31-2040	35,000,000.00	34,711,918.00	35,000,000.00	3.988%	879,545.20	1,405,728.00
FO 1040	05-27-2009	12-31-2040	25,000,000.00	24,809,904.00	25,000,000.00	4.374%	653,104.12	1,101,362.00
FO 1045	06-04-2009	12-31-2040	25,000,000.00	24,810,576.00	25,000,000.00	4.391%	631,582.19	1,105,646.00
FO 1055	06-08-2009	12-31-2040	40,000,000.00	39,710,258.00	40,000,000.00	4.605%	1,039,594.52	1,855,326.00
FO 1050	06-08-2009	12-31-2040	25,000,000.00	24,818,911.00	25,000,000.00	4.605%	649,746.57	1,159,578.00
FO 1060	06-15-2009	12-31-2040	25,000,000.00	24,818,719.00	25,000,000.00	4.600%	626,986.30	1,158,318.00
HO 1065	06-29-2009	12-31-2040	14,485,582.10	14,254,208.00	14,596,000.00	4.252%	515,981.90	00.601,10
FO 10/0	00-30-2009	12-31-2040	25,000,000,000 AD	24,577,819.00	75 000 000 000 00	4.202%	101,120.70	1,049,679.00
FO 10/3 EO 1080	01-09-2009	12-31-2040	12 851 296 57	12 651 023 00	12 900 000 000 00	4 382%	258,634,05	564.303.00
FO 1085	01-20-2009	12-31-2040	25.000.000.00	24.813.447.00	25.000.000.00	4.464%	501.435.61	1.124.044.00
FO 1090	08-05-2009	12-31-2039	10,000,000.00	9,919,395.00	10,000,000.00	4.396%	178,248.76	442,734.00
FO 1100	08-10-2009	12-31-2040	25,000,000.00	24,817,526.00	25,000,000.00	4.569%	447,511.65	1,150,506.00
FO 1095	08-12-2009	12-31-2040	25,000,000.00	24,810,536.00	25,000,000.00	4.390%	423,965.75	1,105,393.00
FO 1105	09-15-2009	12-31-2040	20,000,000.00	19,840,461.00	20,000,000.00	4.142%	242,846.03	834,318.00
FO 1110	09-16-2009	12-31-2040	20,000,000.00	19,842,154.00	20,000,000.00	4.194%	243,596.71	844,800.00
FO 1115	09-22-2009	12-31-2040	20,000,000.00	19,841,536.00	20,000,000.00	4.175%	228,767.13	840,969.00
FO 1120	09-23-2009	12-31-2039	20,000,000.00	19,830,319.00	20,000,000.00	4.13/%	224,418.08	00.002,558
F01125	10-01-2009	12-31-2039	6 000 000 000 00	18,833,/33.00 5 050 625 00	19,000,000 19	2.0000 2	100,450,001	741 103 00
FU1130 E01135	10-01-11	12-31-2040	0,000,000.00	00.000,000,0 787.068.00	0,000,000.00 25,000,000,000,00	4 117%	171 754 11	1.036.531.00
ECI140	11-18-2009	12-31-2039	25,000,000,00	24,787,068,00	25.000.000.00	4.117%	121.254.11	1.036.531.00
F01145	11-19-2009	12-31-2039	25.000,000.00	24,788,687.00	25,000,000.00	4.156%	119,556.16	1,046,357.00
F01150	11-19-2009	12-31-2039	25,000,000.00	24,788,687.00	25,000,000.00	4.156%	119,556.16	1,046,357.00
		Total FFB	2,149,062,935.51	2,090,228,718.00	2,513,926,026.19		91,309,739.85	103,357,927.00
						I		
9.1990 - Payments Unapplied			(4,819,344.28)			5.000%		
Interest on LT Debt			2,533,529,917.01	2,472,794,071.11			113,319,763.93	117,770,143.05
Annual Debt Fees			N/A					
Amortization of Issuance Costs			N/A					
		ļ	2,533,529,917.01	2,472,794,071.11				
Sick Leave Reserve			1,397,572.00	1,257,572.00				
		C						
Total Long-Term Debt and Annualized Cost		×	2,608,452,488.80	2,608,452,488.86 \$ 2,533,101,643.11				

Notes

COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 9RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

Request 9. In Case No. 2008-00409, Mr. Daniel Walker, testifying for EKPC, stated, "To restore positive credit credentials, East Kentucky must earn a TIER on a consistent basis that would result in a credit assessment equivalent to the BBB+ to A+ range." Mr. Walker indicated that EKPC was not currently rated by the rating agencies.

Request 9a.Explain whether EKPC has sought a credit rating from Standard &Poor's, Moody's Investors Service, or Fitch since the end of Case No. 2008-00409.Response 9a.2008-00409.

<u>Request 9b.</u> If yes to part a. of this request, provide EKPC's current rating or an explanation for why it did not receive a rating.

Response 9b. This is not applicable. Please see the response to 9a.

<u>Request 9c(1).</u> If no to part a. of this request:

Explain why EKPC chose not to seek a rating from the rating agencies; and
Response 9c(1). Because investors in the private placement market primarily
consist of insurance companies, EKPC has not yet sought a credit rating. While having a
credit rating is a benefit, private placement investors have more latitude in what type of

investments they can make and as such do not specifically require borrowers obtain a credit rating. EKPC currently carries an NAIC-2 rating from the National Association of Insurance Commissioners (NAIC) as a result of Prudential Insurance being one of EKPC's existing lenders to its unsecured credit facility. An NAIC-2 rating is considered to be equivalent to an investment-grade credit rating. Insurance companies are required to obtain an NAIC rating on all their investments. Because the proposed financing is secured (unlike the credit facility), EKPC may be able achieve an NAIC-1 rating, NAIC's highest rating, on the proposed transaction.

Request 9c(2). Explain how, absent a credit rating of the type described by Mr. Walker in Case No. 2008-00409, EKPC expects to be able to attract the investors needed to market its proposed private placement debt.

Response 9c(2). In order to execute a private placement transaction, EKPC would use a placement agent selected from one of EKPC's existing lenders. The placement agent would assist EKPC by putting together a private placement memorandum and conducting road shows with potential investors. According to private placement trade publication data, there were approximately \$32 billion private placement debt offerings in 2009. It is expected that EKPC will be able to attract the investors without obtaining a credit rating.

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COMMISSION STAFF'S FIRST DATA REQUEST DATED 01/21/10REQUEST 10RESPONSIBLE PERSON:David G. EamesCOMPANY:East Kentucky Power Cooperative, Inc.

Request 10. In his testimony in Case No. 2008-00409, Mr. Daniel Walker's analysis included a comparison of EKPC's three-year average Times Interest Earned Ratio ("TIER") with those of other generation and transmission cooperatives. Provide EKPC's TIER calculations for the years 2007, 2008, and 2009 and its average TIER for those three years. A preliminary 2009 TIER calculation based on an unaudited statement of operations will be acceptable for this response.

Response 10. EKPC's TIER calculations are shown below.

<u>2007</u>	<u>2008</u>	<u>2009 (unaudited)</u>	<u>3-Yr Average</u>
1.43	1.25	1.27	1.32