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January 23, 2009

RECEIVED

JAN 23 2009

PUBLIC SERVICE
COMMISSION

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602

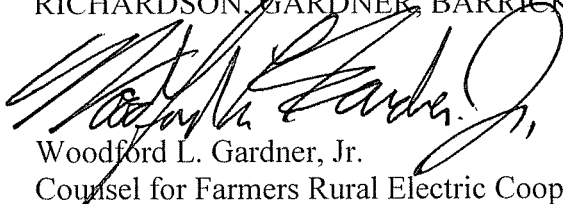
Re: Application of Farmers Rural Electric for an Adjustment of Rates
Case No. 2008-00030

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of the responses to the Commission's Order "First Data Request of the Commission Staff to Farmers Rural Electric Cooperative Corporation" dated May 16, 2008.

Please contact me at (270) 651-8884 or William T. Prather at (270) 651-2191 with any questions regarding this filing.

Respectfully submitted,
RICHARDSON, GARDNER, BARRICKMAN & ALEXANDER


Woodford L. Gardner, Jr.
Counsel for Farmers Rural Electric Cooperative

Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

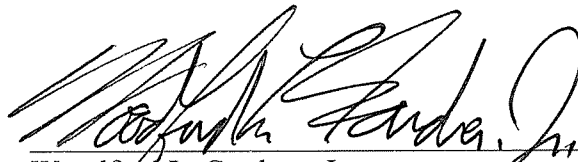
In the Matter of adjustment of Rates
Of Farmers Rural Electric Cooperative
Corporation

Case No. 2008-00030

APPLICANT'S RESPONSES TO
FIRST DATA REQUEST OF COMMISSION STAFF

The applicant, Farmers Rural Electric Cooperative Corporation, makes the following responses to the "First Data Request of Commission Staff", as follows:

1. The witnesses who are prepared to answer questions concerning each request are William T. Prather, Alan Zumstein, and Jim Adkins.
2. William T. Prather, President and CEO of Farmers Rural Electric Cooperative Corporation is the person supervising the preparation of the responses on behalf of the applicant.
3. The responses and Exhibits are attached hereto and incorporated by reference herein.



Woodford L. Gardner, Jr.
Richardson, Gardner, Barrickman & Alexander
Attorneys-At-Law
117 E. Washington Street
Glasgow, Kentucky 42141
Attorney for Farmers Rural Electric Cooperative
Telephone: 270-651-8884

The undersigned, William T. Prather, as President & CEO of Farmers Rural Electric Cooperative Corporation, being duly sworn, states that the responses herein are true and accurate to the best of my knowledge and belief formed after reasonable inquiry.

Dated: January 23, 2009

FARMERS RURAL ELECTRIC COOPERATIVE

By: William T. Prather
WILLIAM T. PRATHER, PRESIDENT & CEO

Subscribed, sworn to, and acknowledged before me by William T. Prather, as President & CEO for Farmers Rural Electric Cooperative Corporation on behalf of said Corporation the 23rd day of January, 2009.

Ainda Sue Forster
Notary Public, Kentucky State At Large

My Commission Expires: 7-30-2011

CERTIFICATE OF SERVICE

The undersigned counsel certifies that the foregoing responses have been served upon the following:

Original and Ten Copies

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

Copy

Hon. Lawrence W. Cook
Assistant Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601

This 23rd day of January, 2009

Michael R. Randa
ATTORNEY FOR
FARMERS RURAL ELECTRIC COOPERATIVE

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

1. Provide in comparative form, a detailed income statement, a statement of cash flows, and a balance sheet for the test year and the 12-month period immediately preceding the test year.

Response

See Exhibit V of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

2. Provide Farmers' rate of return on net investment rate base for the test year and 5 preceding calendar years. Include the date used to calculate each return.

Response

See Exhibit K of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

3. Provide Farmers' times interest earned ratio and debt service coverage ratio, as calculated by the Rural Utilities Service ("RUS"), for the test year and the 5 preceding calendar years. Include the data used to calculate each ratio.

Response

See Exhibit K of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

4. Provide Kentucky's Electric Cooperatives Operating Expense and Statistical Comparisons for the most recent 2 years available.

Response

See Exhibit 18 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

5. Provide Farmers' capital structure at the end of each of the periods shown in
Format 5.

Response

See Exhibit Z of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

6. a. List all outstanding issues of long-term debt as of the end of the latest calendar year and the end of the test period together with the related information as shown in Format 6a. A separate schedule is to be provided for each time period. Report in column (k) of Format 6a, Schedule 2, the actual dollar amount of debt cost for the test year. Compute the actual and annualized composite debt cost rates and report them in Column (j) of Format 6a, Schedule 2.

Response

See Exhibit 5 of the Application.

b. Provide an analysis of end-of-period short-term debt and a calculation of the average and end-of-period cost rates as shown in Format 6b.

Response

See Exhibit 5 of the Application

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

7. Provide a trial balance as of the last day of the test year showing account number, subaccount number, account title, subaccount title, and amount. The trial balance shall include all asset, liability, capital, income, and expense accounts used by Farmers. All income statement accounts should show activity for 12 months. Show the balance in each control account and all underlying subaccounts per company books.

Response

See Exhibit Y of the Application.

Farmers Rural Electric Cooperative
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8. Provide a schedule as shown in Format 8, comparing the balances for each balance sheet account or subaccount included in Farmers' chart of accounts for each month of the test year, to the same month of the 12-month period immediately preceding the test year.

Response

See Exhibit W of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

9. Provide a schedule as shown in Format 8, comparing the balances for each income statement account or subaccount included in Farmers' chart of accounts for each month of the test year, to the same month of the 12-month period immediately preceding the test year. The amounts should reflect the income or expense activity for each month, rather than the cumulative balances as of the particular month.

Response

See Exhibit X of the Application.

Farmers Rural Electric Cooperative
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10. Provide the following information for each item of the electric property or plant held for future use at the end of the test year.

- a. Description of property.
- b. Location
- c. Date purchased
- d. Cost.
- e. Estimated date to be placed in service.
- f. Brief description of intended use.
- g. Current status of each project.

Response

Farmers does not have property held for future use.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

11. List all non-utility property, related property taxes, and the accounts where amounts are recorded for the test period. Include a description of the property, the date purchased, and the cost.

Response

Farmers does not have non-utility property.

Farmers Rural Electric Cooperative
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12. Provide all studies, including all applicable workpapers, that are the basis of jurisdictional plant allocations and expense account allocations.

Response

Not applicable.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

13. Provide Farmers' current bylaws. Indicate any changes to the bylaws since Farmers' most recent general rate case.

Response

See Exhibit U of the Application. Farmers has substantially changed every aspect of its bylaws since its last general rate case in 1984.

Farmers Rural Electric Cooperative
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14. Provide Farmers' equity management plan. Indicate when the current plan was adopted and identify any changes made in the plan since the year utilized as the test year in Farmers' last rate case. Provide a 5-year analysis of the amount of capital credits refunded to members under the plan and indicate the amounts related to general retirements and special retirements (i.e., estates of deceased patrons).

Response

See Exhibit 20 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

15. Provide Farmers' written policies on the compensation of its attorneys, auditors, and all other professional service providers. Include a schedule of fees, per diems, and other compensation in effect during the test year. Include all agreements, contracts, memoranda of understanding, and any other documentation that explains the nature and type of reimbursement paid for professional services. Indicate if any changes occurred during the test year, the effective date of these changes, and the reason for these changes.

Response

See Exhibit 9 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
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16. Provide Farmers' policies specifying the compensation of directors and a schedule of standard directors' fees, per diems, and other compensation in effect during the test year. If changes occurred during the test year, indicate the effective date and the reason for the changes.

Response

See Exhibit 10 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

17. Provide the date, time, and a general description of the activities at the most recent annual members' meeting. Indicate the number of new board members elected. For the most recent meeting and the 5 previous annual members' meetings, provide the number of members in attendance, the number of members voting for new board members, and the total cost of the annual meeting.

Response

See Exhibit P of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

18. Provide the following:

a. A schedule showing, by customer class (i.e., residential, commercial, industrial, etc.) the amount and percent of any proposed increase or decrease in revenue distributed to each class. Provide a detailed explanation of the methodology or basis used to allocate the requested increase or decrease in revenue to each of the respective customer classes.

b. A schedule showing how the increase or decrease in (a) above was further distributed to each rate charge (i.e., customer or facility charge, kWh charge, etc.). Explain in detail the methodology or basis used to allocate the increase or decrease.

c. If the rate schedule contains a demand charge, describe in detail how the proposed demand charge was determined. Provide all calculations, assumptions, workpapers, methodologies, etc. used in the development of the proposed demand charge.

d. If the rate schedule contains a monthly customer charge, describe in detail how the proposed customer charge was determined. Provide all calculations, assumptions workpapers, methodologies, etc. used in the development of the proposed customer charge.

e. A reconciliation of the Fuel Adjustment Clause ("FAC") revenue and expense for the test year. The net result of this adjustment should remove all FAC revenue and expense from test-year revenue and expense.

f. A reconciliation of the Environmental Surcharge ("ES") revenue and expense for the test year. The net result of this adjustment should remove all ES revenue and expense from test-year revenue and expense.

Response

See Exhibit G and J of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

19. For each rate schedule (rate class), provide the following information for the test year:
- a. Number of customers.
 - b. Kilowatt-hour sales.
 - c. Rate schedule's percent of Farmers' total kilowatt-hour sales.
 - d. Monthly peak KW demands for the rate schedule.
 - e. Total revenue collected.
 - f. Rate schedule's percent of Farmers' total revenues.

Response

See Exhibit J of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

20. Provide a schedule of purchased power costs for the test year and the 12-month period immediately preceding the test year, by vendor, separated into demand and energy components. Include kW and kWh purchased. Indicate any estimates used and explain their use in detail.

Response

See Exhibit 15 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

21. Describe how the test-year capitalization rate was determined. If differing rates were used for specific expenses (i.e., payroll, transportation clearing accounts, depreciation, etc.), indicate the rate and how it was determined. Indicate all proposed charges to the test-year capitalization rate and how they were determined.

Response

See Exhibit 19 of the Application.

No changes are proposed to the test year allocations.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

22. Provide the following:

a. A schedule of salaries and wages for the test year and each of the 3 calendar years preceding the test year as shown in format 22a. For each time period, provide the amount of overtime pay.

b. A schedule showing the percentage of increase in salaries and wages for both union and non-union employees for the test year and the 5 preceding calendar years.

Response

See Exhibit 1 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

23. Provide the following payroll information for each employee:
- a. The actual regular hours worked during the test year.
 - b. The actual overtime hours worked during the test year.
 - c. The test year end wage rate for each employee and the date of the last increase.
 - d. A calculation of the percent of increase granted during the test year.

The information shall identify all the employees as either salaried or hourly, and also as either full-time, part-time, or temporary. Employee numbers or other identifiers may be used instead of employee names. Include an explanation of how the overtime pay rate is determined. All employees terminated during the test year shall be identified (along with the month in which the termination occurred), as well as those employees who replaced terminated employees or were otherwise added to the payroll during the test year. If Farmers has more than 100 employees, the above information may be provided by employee classification.

Response

See Exhibit 1 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

24. Provide the following payroll tax information:
- a. The base wages and salaries used to calculate the taxes, with an explanation of how the base wages and salaries were determined.
 - b. The tax rates in effect at test-year-end.

Response

See Exhibit 2 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

25. Provide the following tax data for the test year:
- a. A schedule of franchise fees paid to cities, towns or municipalities during the test year, including the basis of these fees.
 - b. An analysis of operating taxes imposed by Kentucky as shown in Format 25b.

Response

See Exhibit 4 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

26. Provide a statement of electric plant in service, per company books, for the test year. This data shall be presented as shown in Format 26.

Response

See Exhibit 3 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

27. Provide a schedule of all employee benefits available to Farmers' employees. Include the number of employees at test-year-end covered under each benefit, the test year end actual cost of each benefit, the amount of the cost capitalized, the amount of the cost expensed, and the account numbers in which the capitalized or expensed costs were recorded.

Response

See Exhibit 19 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

28. Provide a schedule reflecting the salaries and other compensation of each executive officer for the test year and 2 preceding calendar years. Include the percentage annual increase and the effective date of each increase, the job title, duty and responsibility of each officer, the number of employees who report to each executive officer, and to whom each executive officer reports. Also, for employees elected to executive officer status during the test year, provide the salaries, for the test year, for those persons whom they replaced.

Response

See Exhibit 1 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

29. Provide a detailed analysis of advertising expenditures during the test year. Include a breakdown of Account No. 913, Advertising Expenses, as shown in Format 29, and show any advertising expenditures included in other expense accounts. Specify the purpose and expected benefit of each expenditure.

Response

See Exhibit 11 of the Application.

Farmers Rural Electric Cooperative
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30. Provide an analysis of Account No. 930, Miscellaneous General Expenses, for the test year. Include a complete breakdown of this account as shown in Format 30. Include all detailed workpapers supporting this analysis. At a minimum, the workpapers shall show the date, vendor, reference (i.e., voucher no., etc.), dollar amount, and a brief description of each expenditure. Detailed analysis is not required for amounts less than \$100 provided the items are grouped by classes as shown in Format 30.

Response

See Exhibit 11 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

31. Provide an analysis of Account No. 426, *Other Income Deductions*, for the test period. This analysis shall show a complete breakdown of this account as shown in Format 31, and further provide all detailed supporting workpapers. At a minimum, the workpapers should show the date, vendor, reference (i.e., voucher no., etc.), dollar amount, and brief description of each expenditure. Detailed analysis is not required for amounts of less than \$250 provided the items are grouped by classes as shown in Format 31.

Response

See Exhibit 8 of the Application.

Farmers Rural Electric Cooperative
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32. Provide the name and personal mailing address of each member of Farmers' board of directors. Identify the members who represent the cooperative on the board of directors of East Kentucky Power Cooperative, Inc. ("East Kentucky"). If, during the course of these proceedings, any changes occur in board membership, update your response to this request.

Response

See Exhibit 10 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

33. Provide a detailed analysis of the total compensation paid to each member of the board of directors during the test year, including all fees, fringe benefits, and expenses, with a description of the type of meetings, seminars, etc. attended by each member. Identify any compensation to Farmers' board of directors for serving on East Kentucky's board of directors. Do any of the listed expenses in this analysis include the costs for a director's spouse? If yes, list expenses for the director's spouses separately.

Response

See Exhibit 10 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

34. Provide a detailed analysis of expenses incurred during the test year for professional services, as shown in Format 34. Include detailed workpapers supporting this analysis which show the payee, dollar amount, reference (i.e., voucher no. etc.), account charged, hourly rates and time charged to the utility according to each invoice, and a brief description of the service provided. Identify all rate case work by case number.

Response

See Exhibit 9 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

35. Provide the following information concerning the costs for the preparation of this case:
- a. A detailed schedule of costs incurred to date. Include the date of the transaction, check number or other document reference, the vendor, amount, a description of the services performed, and the account number in which the expenditure was recorded. Indicate any costs incurred for this case during the test year. Include copies of invoices received from the vendors.
 - b. An itemized estimate of the total cost to be incurred, detailed explanation of how the estimate was determined, and all supporting workpapers and calculations.
 - c. Monthly updates of the actual costs incurred during the course of this proceeding, in the manner prescribed above.

Response

See Exhibit 12 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

36. Provide the estimated dates for draw downs of unadvanced loan funds at test-year-end and the proposed uses of these funds.

Response

Farmers has \$17,402,000 of unadvanced funds from Federal Financing Bank (FFB). Funds will be advanced as soon as RUS allows. These funds will be used to repay the short term borrowings that have been required as a result of RUS suspending the advances until Farmers files this rate application with the Commission.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

37. Provide a list of depreciation expenses using Format 37.

Response

See Exhibit 3 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

38. Are the depreciation rates reflected in this filing identical to those most recently approved by the Commission?

- a. If yes, identify the case in which they were approved.
- b. If no, provide the depreciation study that supports the rates reflected in this filing.

Response

Yes, except for the automated meter reading information devices (AMI). Farmers has elected to use a 15 year life on these assets.

Farmers Rural Electric Cooperative
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39. Provide information for plotting the depreciation guideline curves in accordance with RUS Bulletin 183-1, as shown in Format 39.

Response

See Exhibit 3 of the Application.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

40. For each charitable and political contribution (in cash or services), provide the amount, recipient, and specific account charged.

Response

There were none during the test year.

Farmers Rural Electric Cooperative
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41. Describe Farmers's lobbying activities and provide a schedule showing the name and salary of each lobbyist; all company-paid or reimbursed expenses or allowances; and the account charged for all personnel for whom a principal function is lobbying, on the local, state, or national level. Indicate whether the lobbyist is an employee or an independent contractor. If any amounts are allocated, show a calculation of the factor used to allocate each amount.

Response

Farmers does not engage in lobbying activities.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

42. Provide complete details of the financial reporting and rate-making treatment of Farmers's pension costs.

Response

Farmers has a defined benefit and 401(k) pension plan. The treatment is the same for financial reporting as rate-making purposes.

Farmers Rural Electric Cooperative
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43. Provide complete details of Farmers's financial reporting and rate-making treatment of Statement of Financial Accounting Standard ("SFAS") No. 106, including;

- a. The date Farmers adopted or plans to adopt SFAS No. 106.
- b. All accounting entries made or to be made at the date of adoption.
- c. All actuarial studies and other documents used to determine the level of SFAS No. 106 cost recorded or to be recorded by Farmers.

Response

Farmers adopted SFAS No. 106 in January, 2008. See Exhibit 6 of the Application.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

44. Provide complete details of Farmers's financial reporting and rate-making treatment of Statement of Financial Accounting Standard ("SFAS") No. 112, including;

- a. The date Farmers adopted or plans to adopt SFAS No. 112.
- b. All accounting entries made or to be made at the date of adoption.
- c. All actuarial studies and other documents used to determine the level of SFAS No. 112 cost recorded or to be recorded by Farmers.

Response

SFAS No. 112 does not apply to Farmers.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

45. Provide any information as soon as it is known, describing any events occurring after test year that would have a material effect on net operating income, rate base, and cost of capital that is not incorporated in the filed testimony and exhibits.

Response

None are known at this time.

Farmers Rural Electric Cooperative
Case No. 2008-00030
First Data Request of Commission Staff

46. Provide all current labor contracts and the most recent contracts in effect prior to the current contracts.

Response

There are none.

Farmers Rural Electric Cooperative
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First Data Request of Commission Staff

47. Provide separate schedules, for the test year and the 12-month period immediately preceding the test year that show the following information regarding Farmers's investments in subsidiaries and joint ventures:

a. Name of subsidiary or joint venture.

Response: Farmers owns 75% of the stock of Farmers Energy Services Corporation, East Kentucky Power Cooperative owns the remaining 25%.

b. Date of initial investment.

Response: An initial investment of \$225,000 was made in 1997.

c. Amount and type of investment.

Response: Farmers has invested \$780,000 of capital investment in its subsidiary.

d. Balance sheet and income statement. Where only internal statements are prepared, furnish copies of these.

Response: Copies attached as of September 30, 2008 and 2007.

e. Name of officers of each of the subsidiaries or joint ventures, officer's annual compensation, and portion of compensation charged to the subsidiary or joint venture. Indicate the position that each officer holds with Farmers and the compensation received from Farmers.

Response:

| <u>Name of Officer</u> | <u>Compensation from Subsidiary</u> | <u>Compensation charged to Subsidiary</u> | <u>Position with Farmers</u> | <u>Compensation from Farmers</u> |
|------------------------|-------------------------------------|-------------------------------------------|------------------------------|----------------------------------|
| William Prather | \$ - | \$ 931 | CEO | \$ 135,321 |
| H. Wayne Davis | \$ - | \$ 455 | CFO | \$ 79,105 |
| Chuck Caudill | \$ - | \$ - | n/a | \$ - |

Farmers Rural Electric Cooperative
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48. Provide separate schedules showing all dividends or income of any type received by Farmers from its subsidiaries or joint ventures for the test year and the 3 years preceding the test year. Indicate how this income is reflected in the reports filed with the Commission and any reports to Farmers' member customers.

Response

| | <u>Dividends</u> | <u>Income</u> | <u>Rent</u> |
|-----------|------------------|---------------|-------------|
| Test year | \$0 | \$54,546 | \$4,800 |
| 2006 | \$0 | \$99,535 | \$4,800 |
| 2005 | \$0 | \$145,423 | \$4,800 |
| 2004 | \$0 | \$18,357 | \$4,800 |

Farmers Rural Electric Cooperative
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49. Concerning non-regulated activities:

a. Is Farmers engaged in any non-regulated activities? If yes, provide a detailed description of each non-regulated activity.

Response: No.

b. Is Farmers engaged in any non-regulated activities through an affiliate? If yes, provide the name of each affiliate and the non-regulated activity in which it is engaged.

Response: Yes. Farmers provides propane services thru its subsidiary as detailed in Question 47 above.

c. Identify each service agreement with each affiliate and indicate whether the service agreement is on file with the Commission. Provide a copy of each service agreement not already on file with the Commission.

Response: No service agreements exist.

d. Has Farmers loaned money or property to any affiliate? If yes, describe in detail what was loaned, the terms of the loan, and the name of the affiliate.

Response: No.