

**BEFORE THE
SURFACE TRANSPORTATION BOARD
Washington, DC 20423**

In the Matter of:

**METHODOLOGY TO BE EMPLOYED IN
DETERMINING THE RAILROAD INDUSTRY'S
COST OF CAPITAL**

STB Ex Parte No. 664

NOTICE OF INTENT TO PARTICIPATE

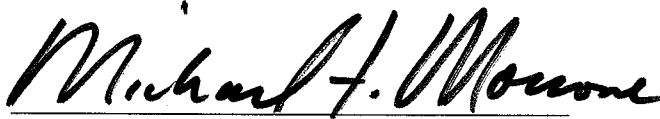
Arkansas Electric Cooperative Corporation ("AECC"), pursuant to the Surface Transportation Board's October 24, 2007 Notice of Public Hearing scheduled in the above-captioned docket for December 4, 2007, respectfully submits this Notice of Intent to Participate in that docket via the submission of written testimony by November 27, 2007. AECC does not seek, however, to present a witness at the December 4 hearing and hence is not requesting to reserve any time on December 4 to deliver live testimony. The topics that AECC will cover in the aforementioned written testimony will address the following considerations:

- (1) Railroad claims regarding investment needs including the Cambridge Systematics study;

- (2) railroad arguments and evidence regarding specific parameters; and
- (3) interpretation of recent observation of increased betas.

Respectfully submitted,

Arkansas Electric Cooperative Corporation



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November 20, 2007