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December 17, 2018

Kimberly D. Bose, Secretary
Federal Energy Regulatory
Commission 888 First Street, NE
Washington, DC 20426

Re: Dockets ER18-1598-000 and EL18-77-000, Show Cause Order

Dear Secretary Bose,

In response to the Show Cause Order issued by the Federal Energy Regulatory Commission ("Commission") in Docket EL18-77-000 on March 15, 2018, Central Hudson Gas & Electric Corporation ("Central Hudson") on May 14, 2018, filed with the Commission an amended transmission revenue requirement with an effective date of July 1, 2018 that reflects adjustment for the Tax Cut and Jobs Act of 2017. On November 15, 2018 Commission Staff ("Staff") issued a deficiency letter and asked Central Hudson to provide additional information. On behalf of Central Hudson, the New York Independent System Operator, Inc. ("NYISO") has submitted this letter and amendment in response to the deficiency letter, agreeing with Staff's proposals.¹ The revised amendments submitted with this filing represent Central Hudson's agreement with, and adoption of, Commission Staff's calculated revenue requirement adjustment and suggested effective date.²

The following attachments are included with this filing:

Attachment 1: A clean version of Section 14.1 of the NYISO OATT reflecting the tariff revisions proposed herein;

¹ The NYISO is submitting this filing in the Commission's e-Tariff system on Central Hudson's behalf solely in its role as Tariff Administrator. The burden of demonstrating that the proposed tariff amendments are just and reasonable rests on Central Hudson, the sponsoring party. The NYISO takes no position on any substantive aspect of this filing at this time.

² In the November 15, 2018 deficiency letter, Commission Staff estimated a revenue requirement reduction of \$1,049,067 and suggested that a proposed effective date of March 21, 2018 for the adjustment may be more appropriate. The tariff revisions submitted herewith propose revisions to Table 1 in Section 14.1.4 of the NYISO Open Access Transmission Tariff ("OATT") to reflect a reduction to Central Hudson's stated annual revenue requirement in an amount equal to the value calculated by the Commission Staff. Consistent with Commission Staff's position, Central Hudson also proposes a March 21, 2018 effective date for the proposed tariff revisions.

Attachment 2: A blacklined version of Section 14.1 of the NYISO OATT reflecting the tariff revisions proposed herein; and

Attachment 3: A clean version of Section 14.1 of the NYISO OATT incorporating tariff revisions that have, or have been proposed to, become effective subsequent to the March 21, 2018 effective date requested for the tariff revisions proposed herein.³

Please contact the undersigned at (845)486-5831 or pcolbert@cenhud.com with any questions regarding this matter.

Respectfully submitted,



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³ NYISO OATT Section 14.1 was filed on: February 15, 2018 in Docket No. ER18-861-000, effective April 17, 2018; July 20, 2018 in Docket No. ER18-2048-000, effective September 19, 2018, and October 17, 2018 in Docket No. ER19-132-000, effective April 1, 2018.