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December 12, 2025

Via E-TARIFF

Ms. Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Central Hudson Gas & Electric Corporation, New York Independent System
Operator, Inc., Docket No. ER25-2636-000
Compliance Filing

Dear Secretary Reese:

On June 26, 2025 and as amended on September 18, 2025, Central Hudson Gas & Electric Corporation (“Central Hudson”) filed, pursuant to section 205 of the Federal Power Act (“FPA”),¹ revisions to its transmission formula rate under Rate Schedule 12 of the New York Independent System Operator (“NYISO”) Open Access Transmission Tariff (“OATT” as set forth in Attachment 1 to Rate Schedule 12 (Filing)).² On November 17, 2025, the Federal Energy Regulatory Commission (“the Commission” or “FERC”) issued an Order Accepting Proposed Tariff Revisions, Subject to Condition, and Establishing a Show Cause Proceeding (“Order”).³ In the Order, the Commission accepted Central Hudson’s filing, subject to conditions, effective as of August 26, 2025,⁴ and a compliance filing to be filed with the Commission within 30 days of the Order (“Compliance Filing”). In the Order, the Commission also initiated a show cause proceeding pursuant to section 206 of the FPA and directed Central Hudson, within 60 days of the date of the Order, to either: (1) show cause as to why Central Hudson’s formula rate protocols under Rate Schedule 12 of the NYISO OATT (the “Protocols”) remain just and reasonable and not unduly discriminatory or preferential; or (2) explain what changes to the Protocols it believes would remedy the identified concerns if the Commission were to determine that the Protocols have, in fact, become unjust and

¹ 16 U.S.C. § 824d.

² Filing, Transmittal Letter at 1.

³ 195 FERC § 61,126.

⁴ Ibid at 1.

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unreasonable or unduly discriminatory or preferential and, therefore, Central Hudson would proceed to establish replacement formula rate protocols.⁵

This present filing is the 30-day Compliance Filing required by the Commission's Order, with Central Hudson making changes to its Hurley Avenue Formula Rate as directed by the Commission in its Order.⁶ Central Hudson will respond separately in the near future to the show cause proceeding initiated by the Commission related to the Protocols.

Compliance Items:

The Commission required Central Hudson in a compliance filing to make the following changes to its Hurley Avenue Formula Rate under Rate Schedule 12 of the NYISO OATT ("Hurley Avenue Formula Rate"):

1. Add language to the Hurley Avenue Formula Rate to reflect the Central Hudson's commitment to make available to any requesting stakeholders, during the annual review process, its post-retirement benefits other than pensions ("PBOP") actuarial studies that support the accrual amounts included in the Hurley Avenue Formula Rate;
2. Correct the hard-coding of the values in the "Year" cells in the following attachments: Attachment 2 – Cost Support, Attachment 3 – Cost Support, Attachment 6c – Accumulated Deferred Income Taxes – Prorated Projection, Attachment 7 – True Up, Attachment 7a – Interest Rate, and Attachment 9 - Workpapers. Central Hudson must revise the Hurley Avenue Formula Rate template such that the "Year" columns are inputs, as opposed to hard-coded values;
3. Indicate that the proposed depreciation rates in Attachment 8 of the Hurley Avenue Formula Rate are effective August 26, 2025 rather than July 1, 2024; and
4. Remove all revisions in the June 26, 2025 filing that were made to comply with Order No. 864.

Central Hudson's Hurley Avenue Formula Rate Changes:

In this Compliance Filing, Central Hudson has made the following changes to its Hurley Avenue Formula Rate:

⁵ Ibid.

⁶ The NYISO submits this filing in its role as Tariff Administrator for the NYISO OATT. The burden of demonstrating that this Compliance Filing is just and reasonable rests with Central Hudson, the sponsoring party. The NYISO takes no position on any substantive aspect of this filing at this time.

1. Central Hudson has added language to Note D of Appendix A stating its commitment to provide PBOP actuarial studies to any stakeholder that requests them during the annual review process.
2. As to the hard coding of the Year cell in several worksheets, Central Hudson brings to the Commission's attention that most of the Year cells reference input cells in the Hurley Avenue Formula Rate and are not hard coded. Referencing input cells avoids having to input the new year in several places for each annual formula rate update. However, in its review of this item, Central Hudson made enhancements to several cells to improve the annual Year updating. The cells Central Hudson changed are highlighted in orange on Attachment 2, Attachment 3, Attachment 4, Attachment 6c (corrected incorrect year values), Attachment 6d, Attachment 7, and Attachment 9.
3. Central Hudson has included an effective date of August 26, 2025 on Attachment 8 – Depreciation Rates.
4. Central Hudson has eliminated Attachment 5 – Excess/Deficient Accumulated Deferred Income Taxes but has retained the tab for future use (when it makes an Order 864 compliance filing in the future). Central Hudson has removed the related line on Appendix A, Line 22, but retained it for future use for the same reason. Since the Hurley Avenue investment post-dated the change in federal tax rates from the Tax Cut and Jobs Act, there are no excess or deficient accumulated deferred income taxes associated with this project. Notwithstanding, Central Hudson will make a Section 205 filing in the near future to comply with Order 864, as required by the Commission.
5. Other changes – 1) corrected a spelling error on Line 36 of Appendix A; 2) moved the Project description on Attachment 9 (moved from cell C30 to cell C29); 3) made row 12, col. b through l on Attachment 9 input cells; 4) made cell D8 on Attachment 4 an input cell; 5) eliminated highlighting in cells B22 through B32 and B40 through B50 within Attachment 7 as input is not needed; 6) and corrected a formula in cell E144 of Appendix A to include all items in the description (the reference in col. D was correct while the formula in col. E was incorrect).

List of filing documents:

Attachment A – Proposed Revisions to Section 6.12.5.2.1 of Attachment 1 to Rate Schedule 12 of the NYISO OATT with revisions proposed in this Compliance Filing shown highlighted in orange (provided in Excel and .PDF formats).

Attachment B - Clean Version of Proposed Revisions to Section 6.12.5.2.1 of Attachment 1 to Rate Schedule 12 of the NYISO OATT.

Attachment C – Excel Version of unpopulated Hurley Avenue Rate Schedule 12 transmission formula rate

Central Hudson appreciates the Commission’s review of this Compliance Filing.

Respectfully submitted,

/s/ Christopher Sharp

Christopher Sharp

Associate General Counsel, Regulatory Affairs

cc: Parties on the service list compiled by the Secretary in this Proceeding

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the foregoing document to be served upon all parties designated on the official service list in these proceedings in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Poughkeepsie, New York, this 12th day of December, 2025.

Respectfully submitted,

/s/ Christopher R. Sharp

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