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March 11, 2026

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

Re: Central Hudson Gas and Electric Corporation
Docket No. ER26-____-000

Dear Secretary Reese:

Central Hudson Gas & Electric Corporation (“Central Hudson”) respectfully submits this filing pursuant to Section 205 of the Federal Power Act (“FPA”),¹ to update the Wholesale Distribution Export Service and Wholesale Distribution Charging Service rates contained within its Rate Schedule 21, Section 6.21 of the New York Independent System Operator, Inc. (“NYISO”) Open Access Transmission Tariff (“OATT”), Wholesale Distribution Service (“WDS”) for Central Hudson Gas and Electric Corporation (hereinafter, “WDS Rate Schedule”).²

I. BACKGROUND AND DESCRIPTION OF TARIFF REVISIONS

Central Hudson filed its WDS Rate Schedule at the Federal Energy Regulatory Commission (“FERC”) on March 8, 2024. Following a subsequent filing, FERC issued an Order Accepting and Suspending Filing, Subject to Refund, and Establishing Hearing and Settlement Procedures.³ After settlement proceedings, FERC approved Central Hudson’s filing of an Offer of Settlement⁴ and Central Hudson refiled its WDS Rate Schedule incorporating the changes made in the Offer of Settlement. FERC issued an order accepting Central Hudson’s settlement compliance filing on February 2, 2026.⁵

As set forth in Central Hudson’s March 8, 2024 filing, the rate design for Central Hudson’s Wholesale Distribution Charging Service, OATT § 6.21.7, was based on the calculation

¹ 16 U.S.C. § 824d.

² The NYISO submits this filing in its role as Tariff Administrator for the NYISO OATT. The burden of demonstrating that the proposed 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.

³ 188 FERC ¶ 61,100 (Aug. 2, 2024).

⁴ 193 FERC ¶ 61,045 (Oct. 17, 2025).

⁵ See Delegated Order Letter at Docket ER24-1434-004

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methodology for Central Hudson's Standby Rates approved by the New York State Public Service Commission ("NYPSC") in 2023.⁶ Likewise, Central Hudson's filed Wholesale Distribution Export Service charges in OATT § 6.21.6 were based on a respective WDS customer's Demand Quantity and their applicable wholesale energy export service demand rates. The demand rates were developed using the same local revenue requirements as Central Hudson's NYPSC-approved retail standby rates, with the exception that certain costs identified as not applicable to exports of electric energy were excluded. Both OATT §§ 6.21.6 and 6.21.7 put customers on notice that "these rates shall be revised periodically to reflect changes in the costs and billing determinants of Central Hudson's primary and secondary distribution facilities."

To that end, the New York State Public Service Commission on August 14, 2025 issued an order adopting updated Central Hudson electric service rates ("2024 Rate Case").⁷ The 2024 Rate Case adopted rates for the successive twelve-month periods ending June 30, 2026, June 30, 2027, and June 30, 2028. Those rate updates necessitate that Central Hudson file these updated Wholesale Distribution Export Service and Wholesale Distribution Charging Service rates.

Attachment 3 to this filing describes in greater detail the updated Wholesale Distribution Charging Service rate components, reflecting the revenue requirement and billing determinants approved in the 2024 Rate Case. The billing determinants represent the approved customer counts, usage, and demand assumptions used to allocate the authorized revenue requirement, and derive the resulting updated rates by rate class and charge component. These forecasted billing determinants are consistent with those agreed upon in the state rate case and used in the design of Central Hudson's retail "SC-14 Standby" and "SC-10 Buyback" rates, which serve as the basis for the Wholesale Distribution Charging Service and Wholesale Distribution Export Service rates; however, the associated revenue requirement has been updated to remove certain cost elements in accordance with the original FERC-approved settlement.

II. LIST OF DOCUMENTS SUBMITTED

Along with this filing letter, Central Hudson submits:

- (1) a clean version of the revisions to Rate Schedule 21, Section 6.21 of the NYISO Open Access Transmission Tariff ("Attachment 1");
- (2) a redlined version of the revisions to Rate Schedule 21, Section 6.21 of the NYISO Open Access Transmission Tariff ("Attachment 2"); and
- (3) WDS Rates 2024 Case Summary document, describing the Wholesale Charging rate

⁶ 4 See Order Establishing Updated Standby Service Rates and Implementing Optional Mass Market Demand Rates, In the Matter of the Value of Distributed Energy Resources, NYPSC Case 15-E-0751 (October 13, 2023).

⁷ NYPSC Order Adopting Terms of a Joint Proposal and Establishing Electric and Gas Rate Plans (Case 24-E-0461).

updates reflecting the revenue requirement and billing determinants approved in the Company's 2024 state rate case ("Attachment 3").

III. EFFECTIVE DATE

Central Hudson requests that these tariff revisions become effective as of July 1, 2025. Central Hudson notes the permissibility of a retroactive effective date in this case, given that the relevant provisions of Rate Schedule 21 to the NYISO OATT being altered here directly advise customers taking service that these rates "shall be revised periodically to reflect changes in the costs and billing determinants of Central Hudson's primary and secondary distribution facilities." Thus, retroactive adoption of these rates fall squarely within the established principle that formula-based rates may be adjusted when buyers are made aware subsequent updates will occur:

no violation of the filed rate doctrine occurs when buyers are on adequate [advance] notice that resolution of some specific issue may cause a later adjustment to the rate being collected at the time of service When the very terms of the filed rate warn customers, at the time they contract for service, that the price charged will fluctuate based on an identified formula with specified cost drivers, then the rate is allowed to change when fluctuations in those cost drivers occur.⁸

Central Hudson further notes that, since FERC adopted Central Hudson's WDS Rate Schedule, no customers have taken service pursuant to it. Consequently, no refund procedures will be required.

IV. CORRESPONDENCE

All correspondence and communications concerning the above-captioned proceeding should be addressed to the following persons:

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V. SERVICE

Central Hudson has confirmed with the NYISO that a complete copy of this filing will be posted on the NYISO's website at www.nyiso.com. The NYISO has also informed Central Hudson that it will send an electronic link to this filing to the official representative of each of its

⁸ Old Dominion Elec. Coop. v. FERC, 892 F.3d 1223, 1231 (D.C. Cir. 2018) (internal quotations and citations omitted).

customers and to each participant on its stakeholder committees.

VI. CONCLUSION

For the reasons set forth here, Central Hudson requests that the Commission approve these tariff revisions as filed with an effective date of July 1, 2025. Please contact me with any questions regarding this submission.

Respectfully submitted,

/s/ Christopher R. Sharp

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