

October 23, 2023

BY eTARIFF FILING

Hon. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Dockets Room, Room 1A
888 First Street, N.E.
Washington, DC 20426

**Re: Central Hudson Gas and Electric Corporation
Proposed Formula Rate Template and Protocols
NYISO OATT Rate Schedule 19**

**Response to Deficiency Letter
Docket No. ER23-2507-00_**

Dear Secretary Bose:

Central Hudson Gas and Electric Corporation (“Central Hudson” or “Applicant”) hereby submits the enclosed response to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) letter requesting further information issued on September 21, 2023, in the above-referenced docket. This submittal supplements the filing the New York Independent System Operator, Inc. (“NYISO”) made on Central Hudson’s behalf on July 28, 2023.

I. Background

On July 28, 2023, the NYISO filed on behalf of Applicant and pursuant to Federal Power Act Section 205 and Part 35.13 of the Commission’s regulations, proposed revisions to the NYISO Open Access Transmission Tariff (“OATT”).¹ Those revisions are to establish Central Hudson’s formula rate template and associated implementation protocols (together “Formula Rate”), and to derive and recover the costs of eligible transmission projects identified and designated under Rate Schedule 19 of the NYISO OATT, as explained further in the submittal. On September 21, 2023, the Commission issued a deficiency letter requesting additional information concerning the Applicant’s filing.

¹ The NYISO submitted the initial July 28, 2023, filing, and submits this filing, on behalf of Central Hudson solely in its role as administrator of the NYISO OATT. The burden of demonstrating that the proposed tariff amendments are just and reasonable rests with Central Hudson. The NYISO takes no position on any substantive aspect of this filing. Unless otherwise defined herein, capitalized terms used herein have the meanings ascribed to them in the NYISO OATT.

II. List of Documents

The Applicant's filing consists of this transmittal letter and the following related supporting documentation:

1. Attachment 1 – Applicant's narrative responses to FERC's September 21, 2023 letter
2. Attachment 2 – Updated clean versions of Applicant's proposed formula rate protocols (as set forth in proposed Section 6.19.9.2.1 of Attachment 4 to Rate Schedule 19 of the NYISO OATT) and formula rate template (as set forth in Section 6.19.9.2.2 of Attachment 4 to Rate Schedule 19 of the NYISO OATT)
3. Attachment 3 – Updated redlined versions of Applicant's formula rate protocols (as set forth in proposed Section 6.19.9.2.1 of Attachment 4 to Rate Schedule 19 of the NYISO OATT) and formula rate template (as set forth in Section 6.19.9.2.2 of Attachment 4 to Rate Schedule 19 of the NYISO OATT)²
4. Attachment 4 – Applicant's New York State Public Service Commission ("NYPSC") 2020 rate case depreciation rate testimony
5. Attachment 5 – Applicant's NYPSC 2020 rate case depreciation study
6. Attachment 6 – Applicant's NYPSC 2020 rate case depreciation exhibit³
7. Attachment 7 – NYPSC 2020 rate case order approving the joint proposal with the joint proposal attached (including the depreciation rates agreed to therein)
8. Attachment 8 – Central Hudson response to Staff CH-1.4 in the Rate Schedule 12 Formula Rate Case regarding the depreciation rate for the Smart Wires Device⁴
9. Attachment 9 – Applicant's formula rate template in excel format reflecting the proposed updates to Workpaper 8 (Electric and Common Depreciation and Amortization Rates)⁵

² The documents in Attachment 3 depict in redline format only the incremental changes to the versions of Sections 6.19.9.2.1 and 6.19.9.2.2 of Attachment 4 to Rate Schedule 19 of the NYISO OATT submitted as part of the initial July 28, 2023 filing in this proceeding.

³ Attachment 6 provides this exhibit in both native excel format and PDF.

⁴ Attachment 8 provides this response in both native excel format and PDF.

⁵ An unpopulated version of the updated formula rate template in native excel format is also being submitted with this filing.

III. Service

Central Hudson will send an electronic copy of this filing to the official representative of each party to this proceeding and to the proceedings associated with the August 19, 2022, order issued by the Commission in Docket No. ER22-2152-000, *et al.*,⁶ which includes the NYPSC. In addition, a complete copy of this filing will be posted on the NYISO's website at www.nyiso.com. The NYISO has confirmed to Central Hudson that it will send an electronic link to this filing to the official representative of each of its customers and each participant on its stakeholder committees. Finally, as required by FERC's September 21 letter, Central Hudson will provide a copy of this filing to Paul Robinson of FERC, at the email address provided therein.

IV. Conclusion

Central Hudson respectfully requests the Commission accept: (1) this informational filing for filing in the above-referenced proceeding; and (2) accept Applicant's proposed tariff revisions (including the incremental changes proposed herein) effective as of September 27, 2023 (*i.e.*, the effective date requested in the initial July 28, 2023, filing in this proceeding).

Respectfully submitted,

/s/ Paul A. Colbert

Paul A. Colbert
Associate General Counsel
Regulatory Affairs

Central Hudson Gas and Electric Corporation

⁶ *Consolidated Edison Co. of N.Y., Inc. et al.*, 180 FERC ¶ 61,106 (2022).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document and attachments on those parties on the official Service List compiled by the Secretary in this proceeding.

Dated at New York, New York, this 23rd day of October 2023.

/s/ Paul A. Colbert

Paul A. Colbert