

June 5, 2024

BY eTARIFF FILING

Hon. Debbie-Anne A. Reese, Acting Secretary
Federal Energy Regulatory Commission
Dockets Room, Room 1A
888 First Street, N.E.
Washington, DC 20426

Re: Central Hudson Gas and Electric Corporation
Docket No. ER24-1434
NYISO OATT Rate Schedule 21
Wholesale Distribution Service

Response to Deficiency Letter

Dear Acting Secretary Reese:

Central Hudson Gas and Electric Corporation (“Central Hudson” or “Applicant”) hereby submits its enclosed response to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) letter requesting further information issued on May 6, 2024, 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 March 8, 2024.

I. Background

On March 8, 2024, 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 amendments to the NYISO Open Access Transmission Tariff (“OATT”).¹ The amendments reflect the addition of a new Rate Schedule 21 to provide for Central Hudson’s recovery of costs associated with the provision of Wholesale Energy Export Service and Wholesale Charging Service (together, “WDS Rates”) to customers who own electric resources connected to Central Hudson’s distribution system and sell the output of those resources through the NYISO administered wholesale markets, as well as customers charging electric energy storage systems for purposes of making wholesale sales

¹ The NYISO submitted the initial March 8, 2024, 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.

through the NYISO-administered wholesale markets.² Central Hudson's WDS Rates have been established in accordance with the calculation methodologies for Central Hudson's Standby and Buyback Rates approved in the New York Public Service Commission ("NYPSC") Standby Rates Order, with appropriate modifications.³ The March 8, 2024 submission provides further explanation, as does Central Hudson's April 15, 2024 Motion for Leave and Answer in the above-referenced proceeding.

On May 6, 2024, the Commission issued a deficiency letter requesting additional information concerning the Applicant's filing.

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 May 6, 2024 letter
2. Attachment 2 – Revenue Requirement
3. Attachment 3 – Allocated Cost of Service Study
4. Attachment 4 – Determination of WDS Revenue Requirement
5. Attachment 5 – A clean tariff version of Central Hudson's proposed revisions for Section 6.21 of the NYISO OATT – Rate Schedule 21
6. Attachment 6 – A redline tariff version of Central Hudson's proposed revisions for Section 6.21 of the NYISO OATT – Rate Schedule 21

III. Service

Central Hudson will send an electronic copy of this filing to the official representative of each party to this proceeding, 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 May 6 letter, Central Hudson will provide a copy of this filing to Emily Chen of FERC at emily.chen@ferc.gov.

IV. Conclusion

Central Hudson respectfully requests the Commission accept: (1) this informational filing in the above-referenced proceeding; and (2) accept the Applicant's proposed tariff revisions

² Central Hudson Gas and Electric Corporation, Filing of Rate Schedule 21 to the NYISO Open Access Transmission tariff, Docket No ER24-1434, March 8, 2024.

³ *Id.* at Section II.

(including the incremental changes proposed herein) effective as of August 5, 2024 (*i.e.*, the day following the end of the statutory 60-day notice period).

Respectfully submitted,

/s/ Paul A. Colbert

Paul A. Colbert
Associate General Counsel
Regulatory Affairs

Central Hudson Gas and Electric Corporation

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 5th day of June 2024.

/s/ Paul A. Colbert

Paul A. Colbert