



August 5, 2016

Honorable Kathleen H. Burgess, Secretary
State of New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 14-M-0224- Community Choice Aggregation Programs:
Central Hudson Compliance Filing

Dear Secretary Burgess:

Pursuant to Ordering Paragraph 4 of the Commission's order issued and effective April 21, 2016¹ in the above captioned proceeding, Central Hudson Gas & Electric Corporation ("Central Hudson" or "the Company") hereby files the following proposed tariff amendments to become effective January 1, 2017.

P.S.C. No. 15 – Electricity

30th Revised Leaf No. 3
Original Leaf No. 163.8
Original Leaf No. 163.8.1
Original Leaf No. 163.8.2

P.S.C. No. 12 – Gas

11th Revised Leaf No. 3
2nd Revised Leaf No. 139
2nd Revised Leaf No. 139.1
4th Revised Leaf No. 140

With these amendments, the Company proposes to implement a fee structure for the provision of data required to effectuate the establishment and maintenance, as applicable, of Community Choice Aggregation ("CCA") programs.

Central Hudson agrees with the Commission's conclusion in its Order that "developing and providing this data will impose some costs on utilities,"² but disagrees that such costs will only be borne "at least until fully automated systems are developed."³ From the outset, the Company will automate the extraction of data requested for a CCA program, but notes that despite automation, costs will be incurred during the request fulfillment process, including specification of data for extraction, review and verification of data before provision, customer care support during the requesting process and after data provision, and ultimately the billing for this service. As a result, the Company has estimated the one-time and on-going costs associated with the provision of three types of data: (1) aggregated customers and consumption (usage) data to support procurement; (2) customer contact data for the initial processing of opt-out letters; and, (3) monthly list of new customers in a municipality. The Company has also included an estimate of the value of the data being provided. Finally, the fee structure proposed by the Company reflects the Commission's directive that such fees be "mostly back loaded and dependent upon the signing of an agreement with an ESCO and the enrollment of customers."⁴ The development of the fees proposed by the Company is detailed in Appendix A.

¹ Case 14-M-0224, Proceeding on the Motion of the Commission to Enable Community Choice Aggregation Programs, Order Authorizing Framework for Community Choice Aggregation Opt-Out Program, (issued April 21, 2016) (Order). The June 6, 2016 filing deadline in the Order was subsequently extended to August 5, 2016 pursuant to an extension granted by the Secretary on June 6, 2016.

² Order, Page 45.

³ Ibid.

⁴ Ibid.

The Company also proposes to offer municipalities the option to request customized aggregated and customer-specific data based on a negotiated fee to cover a feasibility review of such provision, and has included a CCA Customer Data Request Agreement for this purpose in the proposed tariff amendments filed herein.

Based on the specific and on-going nature of this proceeding and the contact inherent in the provision of such data, the Company respectfully requests the waiver of the requirements of Public Service Law §66(12)(b) regarding newspaper publication of these proposed tariff amendments.

Questions related to this filing should be addressed to Glynis Bunt at 845-486-5420 or gbunt@cenhud.com or to Jennifer Lorenzini at 845-486-5523 or jlorenzini@cenhud.com.

Very truly yours,

Anthony S. Campagiorni
Vice President – Regulatory & Government Affairs

LETT390

Central Hudson Gas & Electric Corporation
Case 14-M-0224
CCA Enrollment Processing - Cost Estimate
August 2016

Item		Aggregated Data				Customer-Specific Data				Monthly List - New Customers				
		Hours	# of Municipalities	Rate	Cost	Hours	# of Municipalities	Rate	Cost	Hours	# of Municipalities	Rate	Cost	
A	Programming Generic Data Extract	10		\$ 100	\$ 1,000	8		\$ 100	\$ 800	8		\$ 100	\$ 800	
B	Aggregator/Marketer Inquiry/Request	2	126	\$ 100	\$ 25,200	2	126	\$ 100	\$ 25,200	1	126	\$ 100	\$ 12,600	
C	IT Generation of Data on Request	2	126	\$ 100	\$ 25,200	2	126	\$ 100	\$ 25,200	2	126	\$ 100	\$ 25,200	
D	Compile and Review Data	3	126	\$ 100	\$ 37,800	3	126	\$ 100	\$ 37,800	2	126	\$ 100	\$ 25,200	
E	Billing for Provision of Data	0.25	126	\$ 75	\$ 2,363	0.25	126	\$ 75	\$ 2,363	0.25	126	\$ 75	\$ 2,363	
	Vendor bill printing & mailing		126	\$ 0.556	<u>\$ 70</u>		126	\$ 0.556	<u>\$ 70</u>		126	\$ 0.556	<u>\$ 70</u>	
Total					\$ 91,633						\$ 91,433			
Eligible Customers					307,099						307,099			
F	Data Extraction Cost per Customer				\$ 0.30				\$ 0.30				\$ 0.22	
	Value of Data per Customer				<u>\$ 0.40</u>				<u>\$ 0.80</u>				<u>\$ 0.80</u>	
	Total per Customer				\$ 0.70				\$ 1.10				\$ 1.02	

Initial Data Provision:			
	Aggregated Data		\$ 0.70
	Customer-Specific Data		\$ 1.10
	Total		\$ 1.80
Back Loaded:	Municipality - Aggregated Data	25%	\$ 0.45
	ESCO - Remainder	75%	\$ 1.35

Notes:

- A

Cost to write data extraction programs.
- B

Cost of contact for request/support of data provision.
- C

Cost to initiate data extraction by municipality.
- D

Cost to validate data extraction results before provision to municipality.
- E

Cost to bill for provision of data.
- # of Municipalities

126 electric and gas municipalities with customers counts greater than ten.
- Eligible Customers

Average number of customers for the 12 months ended 6/30/2016 taking service under electric and gas SC 1 & 2.
- F

Estimate of value of personal profile (\$0.80) as referenced in "Prices and Value of Consumer Data," More with Mobile, June 19, 2013.
Estimated at one-half for aggregated data.