

Joseph Hally
Vice President



March 11, 2024

Honorable Michelle L. Phillips, Secretary
State of New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Re: Central Hudson Gas & Electric Corporation Tariff Filing to Reflect New Pole Attachment Rates

Dear Secretary Phillips:

The enclosed rate leaf, issued by Central Hudson Gas & Electric Corporation (the Company), is transmitted for filing in compliance with the requirements of the Public Service Commission of the State of New York, and is as follows:

P.S.C. No. 15 - Electricity

14th Revised Leaf No. 120

This amendment is issued March 11, 2024 to become effective July 1, 2024. The purpose of this filing is to update the pole attachment rates applicable to cable system operators and telecommunication carriers to reflect 2023 actual data. The revised rate applicable to cable system operators included on Leaf 120 has been computed in compliance with the Federal formula for determining CATV attachment rates adopted by Order of the Commission in Case 01-E-0026, issued and effective July 16, 2002.

The manner in which temporary closings in net pole investment are reflected in the attachment rate calculation is consistent with the method that the Company used in a previous filing in Case 08-E-0330. The Company feels that this adjustment is necessary in order to correctly reflect the net investment associated with the total number of equivalent poles, which is a factor utilized in the attachment rate calculation. As explained in the Order of the aforementioned case, temporary closings represent "plant that is included in the continuing property records (CPR) to an unspecified property unit. It is necessary to exclude temporary closings from the cost of the net investment per bare pole calculation, because at this point in time, only investment dollars have been added to the CPR and not the corresponding number of units. By excluding temporary closings, investment dollars are properly matched to pole units. To do otherwise would overstate the cost of a bare pole."¹ The Company recognizes that adjustments for temporary closings are based on internal data, and in an effort to streamline the process of making internal data available to interested parties, the Company was ordered in Case 08-E-0330 to file internal company data used in the pole attachment rate calculation at the time that pole attachment rate filings are submitted to the Commission. Attachment A to this filing letter contains internal company data supporting adjustments made for temporary closings.

The Company also recognizes that accumulated depreciation data included in the pole attachment rate calculation is based on internal data. As the Commission noted in its Order in Case 07-E-0383, "the FCC does not

¹ Case 08-E-0330 – Tariff Filing by Central Hudson Gas & Electric Corporation to Update the Pole Attachment Rates Applicable to Cable System Operators and Telecommunication Carriers, Order Issued and Effective June 19, 2008, Page 3.

forbid a state regulatory agency from using non-public data provided by the utility. Therefore, in reviewing pole attachment rates, a state commission may use internal utility data that it determines are more accurate than FERC-1 or ARMIS data.”² In this same Order, the Commission went on to state, “Staff believes that the internal company data is more accurate for calculating the pole plant depreciation than the data available in the FERC-1 form.”³ Again, in an effort to make internal data readily available, Attachment B to this filing letter contains internal pole plant depreciation data.

The Company has also provided, in Attachment C, additional plant data used in the pole attachment rate calculation. In compliance with the Order in Case 22-E-0124, Attachment D provides the pole quantities and heights for its solely owned poles and poles with joint ownership.

Central Hudson requests that the requirement to publish a notice of this filing be waived, as the Company is arranging to notify all cable system operators and telecommunication carriers doing business within its service territory of this filing.

Questions related to this filing should be directed to Taylor Alonso at (845) 486-5554 or talonso@cenhud.com.

Sincerely,

Joseph Hally

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² Case 07-E-0383 – Tariff Filing by Central Hudson Gas & Electric Corporation to Update the Pole Attachment Rates Applicable to Cable System Operators and Telecommunication Carriers, Order Issued and Effective June 20, 2007, Page 4.

³ Ibid.

Attachment A

Account Summary by Functional Class / Utility Account - Selected Accounts						
Central Hudson - Set of books: SEC				Period Beginning: Jan-2023 Period Ending: Dec-2023		
Functional Class Utility Account	Beginning Balance	Additions	Retirements	Transfers	Adjustments	Ending Balance
G-Electric Distribution						
136400 DISTR-POLES TOWERS & FIXT	\$65,020,531.12	(\$1,030,867.73)	\$0.00	\$0.00	\$0.00	\$63,989,663.39
G-Electric Distribution Subtotal:	\$65,020,531.12	(\$1,030,867.73)	\$0.00	\$0.00	\$0.00	\$63,989,663.39
Grand Total:	\$65,020,531.12	(\$1,030,867.73)	\$0.00	\$0.00	\$0.00	\$63,989,663.39

Attachment B

Combined Reserve Balances and Activity by GL Account

Central Hudson

Starting Month: 01/2023

Ending Month: 12/2023

Set of Books

Company

GL Account

Depr. Group

Beginning Reserve

Provision

Retirements

Cost of
Removal

Salvage and
Other Credits

Transfers and
Adjustments

Impairments
and
(Gain) / Loss

Ending Reserve

SEC

Central Hudson

10801

136400 DISTR-POLES TOWERS \$48,820,888.00 \$9,094,048.56 (\$2,575,166.40) (\$3,645,310.78) \$785,438.66 \$0.00 \$0.00 \$52,479,898.04

GI Account Code Subtotal: \$48,820,888.00 \$9,094,048.56 (\$2,575,166.40) (\$3,645,310.78) \$785,438.66 \$0.00 \$0.00 \$52,479,898.04

Company Subtotal: \$48,820,888.00 \$9,094,048.56 (\$2,575,166.40) (\$3,645,310.78) \$785,438.66 \$0.00 \$0.00 \$52,479,898.04

Grand Total: \$48,820,888.00 \$9,094,048.56 (\$2,575,166.40) (\$3,645,310.78) \$785,438.66 \$0.00 \$0.00 \$52,479,898.04

Attachment C

Account Summary by Functional Class / Utility Account - Selected Accounts						
Central Hudson - Set of books: SEC				Period Beginning: Jan-2023 Period Ending: Dec-2023		
Functional Class Utility Account	Beginning Balance	Additions	Retirements	Transfers	Adjustments	Ending Balance
G-Electric Distribution						
136400 DISTR-POLES TOWERS & FIXT	\$351,200,213.40	\$27,698,622.33	(\$2,575,166.40)	\$0.00	\$0.00	\$376,323,669.33
G-Electric Distribution Subtotal:	\$351,200,213.40	\$27,698,622.33	(\$2,575,166.40)	\$0.00	\$0.00	\$376,323,669.33
Grand Total:	\$351,200,213.40	\$27,698,622.33	(\$2,575,166.40)	\$0.00	\$0.00	\$376,323,669.33

Attachment D

POLE HEIGHTS
Source GIS

pole height	QTY	<u>SOURCE</u>	UPDATED
30	10,119	GIS data export	3/4/2024
35	37,668	GIS data export	3/4/2024
40	66,807	GIS data export	3/4/2024
45	84,695	GIS data export	3/4/2024
50	10,105	GIS data export	3/4/2024
55	1,514	GIS data export	3/4/2024
60	256	GIS data export	3/4/2024
Total	<u>211,164</u>		

Poles that could be identified as non-distribution and customer or foreign owned were excluded. All records only poles could not be identified.