

**BEFORE THE
NEW YORK STATE
PUBLIC SERVICE COMMISSION**

In the Matter of the Application of Central Hudson Gas & Electric Corporation For a Certificate of Environmental Compatibility and Public Need Pursuant to Article VII of the Public Service Law for the A and C Line Rebuild Project, Approximately 10.85 miles of 115 Kilovolt Transmission Lines in the Towns of Pleasant Valley, LaGrange, Wappinger and East Fishkill, in Dutchess County

Case No.: 13-T-_____

**CENTRAL HUDSON GAS & ELECTRIC CORPORATION'S
MOTION FOR WAIVERS OF APPLICATION REQUIREMENTS**

Pursuant to 16 NYCRR §3.3, and as part of its filing of an application for a Certificate of Environmental Compatibility and Public Need for the A and C Line Rebuild Project, involving approximately 10.85 miles of 115-kV transmission lines in the Towns of Pleasant Valley, LaGrange, Wappinger and East Fishkill, in Dutchess County, Central Hudson Gas & Electric Corporation ("Applicant" or "Central Hudson") respectfully requests that the Commission waive or modify for this application the following sections of the Commission's regulations on the information to be included in an application filed pursuant to Article VII of the Public Service Law Article.

- 1. 16 NYCRR §86.3(a)(2): Submit detailed NYSDOT maps (scale 1:250,000) showing the right-of-way for each proposed facility including NYSDOT maps showing the relationship of the proposed facility to the Applicant's overall system with respect to specified information.**

The Applicant requests a waiver of the requirement of 16 NYCRR §86.3(a)(2) that Applicant submit NYSDOT 1:250,000 scale maps showing the relationship of the proposed facility to the Applicant's overall system. Such maps do not appear to be available. Figure 2-2 of the Application, which is based on USGS 1:250,000 scale topographic maps presented at a scale of 1:250,000 (1 inch equals approximately 4 miles), effectively shows the proposed facilities in conjunction with other components of the existing systems of Applicant, and others, and provides the information required by 16 NYCRR §86.3(a)(2)(i)-(iv).

2. **16 NYCRR § 86.3(b)(2): Aerial photographs shall reflect the current situation. Aerial photographs of urban areas and urbanizing fringe areas shall be taken within six months of the date of filing. All aerial photographs shall indicate by whom and on what date the photographs were taken.**

The Applicant requests a waiver of the requirement that "all aerial photographs indicate by whom and on what date the photographs were taken," and that aerial photographs "of urban areas and urbanizing fringe areas" be taken within six months of the date of filing. The Applicant is submitting aerial photographs (Figure 2-3) that were taken as part of New York State Digital Orthoimagery Program in 2009. The Applicant has verified through field reconnaissance that the submitted aerial photographs substantially reflect actual current conditions.

3. **16 NYCRR §88.4(a)(4): Provide appropriate system studies, showing expected flows on the line under normal, peak and emergency conditions, including the system reliability impact study forwarded by the Transmission Planning Advisory Subcommittee for approval by the operating committee of the New York Independent System Operator, which shows effects on stability of the interconnected system.**

Applicant requests a waiver of the requirement of 16 NYCRR §88.4(a)(4) that applicant provide a System Reliability Impact Study ("SRIS"). A System Impact Study ("SIS"), (rather than the SRIS that the Commission's rule specifies), is the type of study that would be required for a transmission project of the type involved in this proceeding, but it is only required if a certain standard is met. Central Hudson has determined that an SIS is not necessary for the A and C Line Rebuild Project. The NYISO has indicated that if the changes in transfer limits are 10 MW or less on each of the interfaces, an SIS is not necessary. An e-mail from Steve Corey of NYISO Staff is included in Appendix D. The two interfaces which will be most affected by the project were studied, and after performing suitable calculations, Central Hudson has concluded that changes on the interfaces were indeed less than 10 MW.

Dated: October 10, 2013

Respectfully submitted,

CENTRAL HUDSON GAS & ELECTRIC CORPORATION

By:


Kevin M Bernstein, Esq.
Bond, Schoeneck & King, PLLC
Attorneys for Applicant
One Lincoln Center
Syracuse, New York 13202
Telephone: 315-218-8000
E-mail: kbernstein@bsk.com