

March 2, 2009

2009 MAR -3 PM 12:59

Hon. Jaclyn A. Brillling
Secretary
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Re: Case 09-M-0074 - In the Matter of Advanced
Metering Infrastructure, Central Hudson Gas & Electric

Dear Secretary Brillling:

Pursuant to the authority provided to the Secretary in Ordering Paragraph 2 of the Commission's Order Adopting Minimal Functional Requirements for Advanced Metering Infrastructure Systems and Initiating an Inquiry into Benefit-Cost Methodologies, Central Hudson Gas & Electric Corporation ("Central Hudson") respectfully requests an extension of the filing deadline by 120 days.

As mentioned in the Order, AMI systems are evolving at a rapid pace and will continue to be dynamic, with various technologies and systems currently being tested and deployed in other States. Central Hudson has been evaluating different technologies and components of an AMI system; however, could not move forward and develop in confidence a pilot without minimal functionality standards defined.

In order to design and develop a well constructed pilot proposal in light of advances in technology even over the last six months, a multitude of tasks are required, that will encompass more than the currently identified filing timeframe of 60 days.

A logical selection and development process is required to coalesce the distinct components inclusive of metering hardware, communications platform and protocols and Meter Data Management System (MDMS) into a prognostic AMI pilot solution. Being that no "turn key" system is available that spans all requirements and delivers a complete solution, careful research, evaluation, and planning will be necessary to integrate multiple vendors solutions and

components as required. Following is an outline list of anticipated tasks necessary.

1) Technology Evaluation

- a. This includes among other components metering hardware, Home Area Network (HAN) hardware, communications platform, networks and protocols, and software solutions for systems and MDMS. In order to gain full appreciation and experience of available solutions site visits to working deployment at other utilities are anticipated during the selection process.
- b. This process also encompasses ensuring compliance with the Order established minimum functional requirements.

2) AMI Device(s) Approval

- a. The December 19, 2007 Order (at 9) indicates that devices selected should have Commission approval prior to implementation. This approval is logically necessary prior to specifying pilot devices, to prevent subsequent rejection of pilot based on device selection.

3) Vendor Selection

- a. Sequential to technology evaluation (item 1), this will require selection and meshing of systems from multiple vendors, allowing enough time to request proposals, evaluate those proposals and subsequently provide pilot framework.

4) AMI Pilot Deployment Site Selection

- a. Due to changes in technology, greater flexibility in system deployment is now available over the originally proposed area, and hence analysis is necessary to determine if that site is still the most viable area to test the capability of the selected system.

5) General Compliance with December 19, 2007 Order

- a. Included in the referenced Order, research and development of required items such as explicit consideration of how hourly pricing data is managed and utilized, dynamic rate offerings, and what customer segments will be targeted, is required for a complete pilot proposal.
- b. Education, outreach, and marketing plans are necessary, which include communicating to and ensuring that customers understand the energy

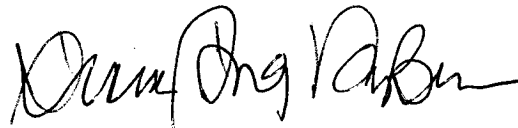
information that will be made available for their use, and mechanisms to collect data about and measure any customer behavioral response to this new information. These plans need to be carefully devised so that required information to form reliable conclusions on this subject will be available to develop meaningful inputs for business case and benefit cost analysis.

6) Development of Internal Resources

- a. Currently, corporate structure does not have resources solely dedicated to the AMI initiative effort. Ramp up time for the anticipated knowledge curve acceleration and labor asset development to accomplish the design and implementation of an AMI pilot is a time added activity.

Given these facts, Central Hudson accordingly requests modification of the required filing date to and including August 11, 2009.

Respectfully submitted,



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