

BEFORE THE NEW  
YORK STATE  
PUBLIC SERVICE COMMISSION

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Proceeding on Motion of the Commission as to the  
Rates, Charges, Rules and Regulations of  
Central Hudson Gas & Electric Corporation  
For Electric Service

CASE 20-E-0428

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Proceeding on Motion of the Commission as to the  
Rates, Charges, Rules and Regulations of  
Central Hudson Gas & Electric Corporation  
For Gas Service

CASE 20-E-0429

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**DIRECT TESTIMONY OF**  
**SIMON STRAUSS**  
**ON BEHALF OF**  
**HIMSELF**

**DECEMBER 22, 2020**

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1 Q. Please state your name, title, and business address.

2  
3 A. My name is Simon Strauss. I am a private citizen who resides at 45 Indian Trail, Shokan  
4 NY 12481. I am Co-Chair of the Town of Olive's Conservation Advisory Council and a  
5 member of the Ulster County Environmental Management Council.

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7 Q. On whose behalf are you testifying?

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9 A. I am testifying on my own behalf as a private citizen.

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11 Q. Please state your educational background and professional experience.

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13 A. I graduated from the University of Edinburgh with a Bachelor of Commerce degree in  
14 Business, Accounting and Engineering. I am a Chartered Accountant and a Certified Public  
15 Accountant and have spent the past twenty-seven years engaged in investment banking,  
16 primarily in infrastructure finance, including energy and telecommunications. I am Co-Chair of  
17 the Conservation Advisory Council ("CAC") of the Town of Olive (the "Town") in Ulster County  
18 and a member of the Ulster County Environmental Management Council.

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20 Q. Have you participated in previous Central Hudson rate cases?

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22 A. This is the first time I am giving testimony.

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24 Q. What is the purpose of your testimony?

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A. To address the capability of Central Hudson’s electrical distribution system to provide capacity to enable robust development of Community Distributed Generation projects.

Q. Thank you. Please state whether you will be presenting evidence.

A. Yes, I am presenting evidence in connection with one of the points I am raising.

Q. What substantive issues are you concerned about?

A. I am concerned about two specific issues and one background issue.

1. The Town’s CAC has identified at least two sites in Olive, one Town-owned adjacent to the Town’s closed landfill and one on a brownfield site in the Town, which the CAC feels would be suitable for development of Community Solar facilities. I originated conversations with Central Hudson’s management to identify whether and when the Company plans to provide capacity for developers to build CDG projects in the Town of Olive, including providing parcel (SBL) numbers to the Company. The Company’s response was that any CDG development west of the Woodstock sub-station is constrained by substation capacity and by the feeder #3011 from Woodstock into Olive which was at capacity for CDG due to the 4.7MW hydro plant at the Ashokan Reservoir dam. At the time (June 2020) the Company’s Distribution Solar PV Hosting Capacity map showed that there was almost no capacity available on that feeder. Since then the Company has either added capacity on that feeder or recalibrated how much capacity is available such that the screen shot Exhibit to this testimony from the Company’s Distribution Solar PV Hosting Capacity map shows that 0.9 MW of capacity is now

1 available on feeder #3011. This is clearly a benefit for CDG in Olive and the Company  
2 should be commended for making changes to incentivize CDG, yet should also be aiming  
3 to provide additional capacity to enable further CDG sites to be developed.  
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5 2. Specific Issue. In CLP-03, IR-20 and IR-21 in these rate cases the Company was asked  
6 to address the need for additional CDG capacity as a result of the CLCPA, and address its  
7 participation in the Hudson Valley Regional Renewable Energy Incentive Plan ("RREIP").  
8 The Company's response to CLP-03, IR-20 was "Central Hudson is not aware of a  
9 comparison of land use possibilities for the 1.4 GW of solar capacity and this comparison  
10 was not a part of the UTDIWGR assessment. The 1.4 GW of solar capacity was  
11 compared against the capability of the existing transmission system and distribution  
12 system and planned upgrades as specified in the report." Central Hudson's participation  
13 in the RREIP is to be commended; however its response to IR-20 does not appear to  
14 match either the spirit or law of the Company's required response. I request that the  
15 Commission make a specific ruling ordering the Company to participate positively in the  
16 RREIP with intent to provide capacity for an agreed amount of CDG capacity on to its  
17 system in areas that the RREIP identifies as suitable for solar PV installations, with an  
18 initial goal of 70% of the Company's service area to be serviced by local CDG by 2030,  
19 with appropriate milestones between now and that date.  
20

21 3. Background Issue. In common with testimony provided by Citizens for Local Power  
22 ("CLP"), I have a significant concern from what I perceive as the Company's inadequate  
23 response to New York's CLCPA and Accelerated Renewable Energy Growth and  
24 Community Benefit (ARDGCB) Act. This issue primarily concerns the five-year capital  
25 plan. Although the Company's capital plan includes some important grid enhancements  
26 that will ultimately make it more capable of accommodating DERs, I am concerned about

1 its lack of attention to the need for distribution upgrades. I believe it is past time for the  
2 Joint Utilities, including Central Hudson, to respond to the PSC's Order, in case 20-E-  
3 0197, to develop ways of valuing capital expenditures that reflect and respond specifically  
4 to New York's energy goals.

5  
6 Also in common with CLP, I oppose Central Hudson's plan to spend ca. \$43 million per  
7 year for the next five years (and beyond) to replace so-called Leak-Prone Pipe and any  
8 consideration that the Company may be giving to green hydrogen as a potential strategy  
9 for reducing or replacing fracked gas for delivery over its gas pipe distribution system.

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