Construction Work in Progress Payments (CWIP) for CARIS II

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January 20, 2011 Rensselaer, NY



Conventional NYS CWIP

- Conventional rate regulation in New York provides for CWIP for certain utility projects
- CWIP treatment allows for the book entry of qualified construction expense prior to commercial operation
- Allowable construction expense is placed into rate base after project placed into service
- Recovery of revenue requirements does not begin until after commercial operation



What if FERC allows CWIP payments prior to project completion?

- Attachment Y does not provide a mechanism for accomplishing such payments
- No provision for including in the cost metric revenue requirements other than those "...reasonably allocated over the first ten years from the proposed commercial operation date...."

Draft – For Discussion Purposes Only



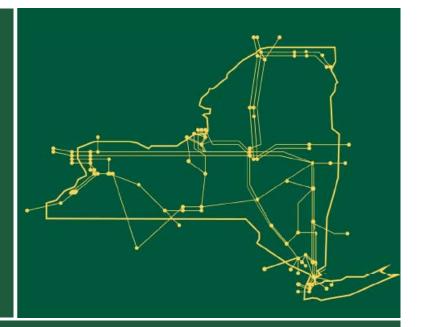
Discussion of Alternatives

- Request developer to disclose intentions re: requesting CWIP payments
- If CWIP payment request is not rejected by developer, then request information on preoperation payment schedule that will be requested.
- Create process for calculating the present value of full revenue requirements if CWIP payments will be sought.

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