

Paul A. Colbert  
Associate General Counsel  
Regulatory Affairs



September 7, 2016

Mr. Craig Lapeijko  
Waterways Management Branch  
Coast Guard First District  
408 Atlantic Avenue  
Boston, MA 02110

Re: USCG-2016-0132, Anchorage Grounds, Hudson River;  
Yonkers, NY to Kingston, NY

Dear Mr. Lapeijko:

Central Hudson Gas & Electric Corporation ("Central Hudson") currently owns and maintains a number of critical gas and electric facilities that traverse the Hudson River in the area between Yonkers and Kingston, New York. Central Hudson, as an operator of these facilities, welcomes the opportunity to comment on the establishment of new anchorage points in the Hudson River.

Central Hudson has a long history of operating gas and electric facilities that cross the Hudson River, the earliest of which date to the 1920's. These facilities were installed in the public interest to provide ample, reliable and safe gas and electric service to the customers. Each was approved and permitted by New York State with fees being paid to the New York State Office of General Services on a 25-50 year cycle. A multitude of installation techniques were used for these crossings ranging from a direct bottom lay to directional drilled. The Company has experienced two significant anchor drag incidents; one gas and one electric, in its operating history. Both incidents resulted in significant damage to the crossings and both had the potential to impact public safety and disrupt gas and electric service to Central Hudson's customers.

It is in the interest of public safety and service that Central Hudson opposes the establishment of anchorage locations in areas of known natural gas and electric crossings. Anchor damage is a nationally recognized risk to utility crossings of navigable waterways. The placement of these anchorages in areas of utility crossings will significantly increase the likelihood of damage to the facilities by anchor deployments or drags and jeopardize public safety.

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Mr. Craig Lapeijko  
September 7, 2016

Page 2

Central Hudson appreciates the United States Coast Guard's efforts in seeking comments on the establishment of new anchorage grounds and looks forward to continued constructive dialog on the subject. Please contact Paul Haering at (845)486-5351 or [phaering@cenhud.com](mailto:phaering@cenhud.com) with any questions regarding this matter.

Respectfully submitted,



Paul A. Colbert  
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