

## Attachment I

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Independent Power Producers of  
New York, Inc.**

**v.**

**New York Independent System  
Operator, Inc.**

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**Docket No. EL18-189-000**

**CONFIRMING AFFIDAVIT OF DAVID MAHLMANN**

David Mahlmann declares:

1. I have personal knowledge of the facts and opinions herein and if called to testify could and would testify competently hereto.
2. I am Manager, Operations Engineering for the NYISO.<sup>1</sup>
3. In this position I am directly responsible for development of system operating models and the development of system operating limits to ensure reliable operation of the New York bulk power system consistent with a wide array of regulatory standards, including applicable portions of NYISO, North American Electric Reliability Corporation (“NERC”), Northeast Power Coordinating Council, and New York State Reliability Council criteria, standards, policies and FERC tariffs to assure compliance.
4. My responsibilities include providing input and support to the NYISO’s Reliability Coordinator function. I am responsible for the NYISO’s representation in the NERC Interchange Distribution Calculator (“IDC”), and I am the NYISO member on both the IDC Working Group and the IDC Steering Committee.
5. It was this access and expertise that allowed me to validate the NYISO’s understanding of the equipment modeling choices selected to represent the transmission network of the Eastern Interconnection in the IDC and how those models relate to the development of distribution factors and the transaction curtailment in response to Transmission Loading Relief (“TLR”) Level 3.
6. I work closely with Mr. Aaron Markham, who provided an Affidavit that is Attachment II to the NYISO’s Answer filed in this proceeding on August 20, 2018. As Mr. Markham describes in his Affidavit, he is responsible for day to day bulk electric system operations

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<sup>1</sup> Terms with initial capitalization not defined herein have the meaning set forth in the NYISO’s Answer.

and dispatch, among other things,<sup>2</sup> to the Grid Operations functions. Therefore, Mr. Markham and his group work closely with me and my group, because it is the responsibility of my group to develop models and standards for bulk electric system operations, which are in turn, Mr. Markham's responsibility to apply. Mr. Markham's Affidavit refuted Mr. Piascik's initial affidavit. Because Mr. Piascik's Answering Affidavit purports to describe modeling and modeling choices, and NERC practices, my affidavit, and the pertinent sections of the NYISO's Answer which it affirms, will refute Mr. Piascik's latest assertions.

7. I have worked in Power System Operations at the New York Power Pool and NYISO for over 37 years.
8. I received a B.S. in Electrical Engineering Technology from the Union College at Schenectady NY.
9. I submit this affidavit to support the *Motion for Leave to Answer and Answer of the New York Independent System Operator, Inc.* ("September 20 Answer"), in this proceeding.
10. The *Motion for Leave to Answer and Answer of Independent Power Producers of New York, Inc.* or the Answering Affidavit of Thomas M. Piascik ("Second Piascik Affidavit") claim that the NYISO has misunderstood NERC's TLR Procedure. They allege that Firm Transmission Withdrawal Rights are necessary to import capacity from PJM across the Zone J MTFs.
11. Section II.B.1 of the September 20 Answer explains that there is no merit to these claims.
12. I have reviewed Section II.B.1. The purpose of this affidavit is to confirm Section II.B.1's statements in response to the Piascik Affidavit. It is also to confirm that the testing and its results that Mr. Markham described in his Affidavit<sup>3</sup> are consistent with and reinforced by the September 20 Answer.

This concludes my affidavit.

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<sup>2</sup> See Markham Affidavit at P. 8.

<sup>3</sup> See Markham Affidavit at PP 24 – 32.


ATTESTATION

I am the witness identified in the foregoing affidavit. I have read the affidavit and am familiar with its contents. The facts set forth therein are true to the best of my knowledge, information, and belief.



David Mahlmann

Subscribed and sworn to before me  
this 20th day of September 2018

  
Notary Public

**LINDA SLOAN**  
Notary Public - State of New York  
No. 01SL6198599  
Qualified in Schenectady County  
My Commission Expires December 29, 2020

My commission expires: December 29, 2020