



(a) (i) serves End Users within the CAISO Balancing Authority Area and (ii) has been granted authority or has an obligation pursuant to state or local law, regulation, or franchise to sell electric energy to End Users located within the CAISO Balancing Authority Area; (b) (i) is an End User, (ii) has been granted authority pursuant to state or local law or regulation to serve its own Load through the purchase of electric energy from an entity that does not qualify as a Load Serving Entity, and (iii) serves its own Load through purchases of electric energy from an entity that does not qualify as a Load Serving Entity with respect to such purchases of electric energy, or (c) is a federal power marketing authority that serves End Users.

Six Cities requests that the Commission direct the CAISO to make a minor revision to the proposed tariff language. The CAISO structured the definition to say that an entity is a Load Serving Entity if it meets part a., part b., or part c. of the definition. Six Cities finds this structure ambiguous because, in its view, the definition could be read to mean that an entity has to meet all three parts of the definition to be a Load Serving Entity. Six Cities asks that FERC order the CAISO to add an additional “or” between part a. and part b. Without this additional clarity, Six Cities is concerned that there could be confusion that impacts Congestion Revenue Rights (CRR) allocations to current Load Serving Entities or excludes from the definition entities that partially serve their load through self-supply.

Six Cities has not identified a legitimate ambiguity in the proposed tariff language and the CAISO sees no reasonable way to read the proposed definition as requiring an entity to meet all three parts of the definition to be considered a Load Serving Entity. The CAISO’s proposed revision follows standard grammatical rules regarding serial semicolons and commas, as well as the conventions of the existing tariff definition. The existing definition also includes a three-part definition separated with a single “or” between the second and third parts.

In reviewing the proposed tariff language, the CAISO, however, recognizes one minor punctuation issue. The punctuation separating part b. from part c. of the definition inadvertently was included as a comma, whereas it should have been a semicolon. The CAISO is prepared, if so ordered on compliance, to submit revised tariff records containing the proper punctuation.

Respectfully submitted,

**/s/ David S. Zlotlow**

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## CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 5<sup>th</sup> day of December, 2016.

*/s/ Grace Clark*  
Grace Clark