

Estimation of Line Losses - Proposal

(objective to promote cost causality while remaining reasonable to complete)

- **Subfunctions**

- Bulk
- Treatment >50 kV assets
- Primary
- Secondary

- Secondary < 750 v

- Bulk (functional definition)

- Primary = Balance

- Standard Example

Function	Losses as % of Load
Total Losses	5%
Substations/Bulk	1%
Secondary	2%
Primary	2%

- **Issues**

- How to estimate/basis
- Measure at peak or average load
- Interclass allocation impacts
- Other Working Group questions
- Engineering line losses versus inclusion of unaccounted for energy
- How best to incorporate above approach in filings (e.g. filing questions?)