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Estimation of Gross Load for Standby Customers

	Contract Capacity (kW)	Comparable Full Service Class	Full Service Load Factor	Average Demand (kW)	Annual Demand MWh	Monthly Demand MWh
PG&E						
Small Standby @ Transmission	770	E19VT	0.0%	-	-	-
Small Standby @ Primary Distribution	1,227	A10P, E19VP	13.5%	166	1,451	121
Small Standby @ Secondary Distribution	2,130	A10S, E19VS	33.1%	705	6,175	515
Large Standby @ Transmission	552,429	E19T, E20T	39.4%	217,657	1,906,676	158,890
Large Standby @ Primary Distribution	54,195	E19P, E19P	49.9%	27,043	236,900	19,742
Large Standby @ Secondary Distribution	1,875	E19S, E20S	18.4%	345	3,022	252
Total	612,626		40.1%	245,916	2,154,225	179,519
SCE						
Small Standby @ Secondary Distribution	7,900	GS-2	7.6%	600	5,260	438
Large Standby @ Transmission	506,600	TOU-8-SUB	62.9%	318,651	2,791,386	232,616
Large Standby @ Primary Distribution	102,500	TOU-8-PRI	47.0%	48,175	422,013	35,168
Large Standby @ Secondary Distribution	14,800	TOU-8-SEC	23.4%	3,463	30,338	2,528
Total	631,800		58.7%	370,890	3,248,996	270,750
SDG&E						
Small Standby	2.0	A	15.2%	0.3	2.7	0.22
Large Standby	102,998	>20 kW	51.0%	52,529	460,154	38,346
Total	103,000		51.0%	52,529	460,157	38,346
Total 3 IOUs	1,347,426		49.7%	669,335	5,863,377	488,615

Calculation of Load Factor for Estimation of Standby Customers' Gross Load

Pacific Gas & Electric

Customer Class	Maximum Billing Demand (kW) (a)	NonCoincident Demand (kW) (b)	Ratio (c)	Energy Sales (kWh) (d)	Billing Load Factor (e)	NonCoinc Load Factor (f)	Standby Contract Demand (kW) (g)	Standby Energy (kWh) (h)	Standby Load Factor (i)	Net Load Factor (j)
Small Standby @ Transmission										
Schedule A-10 T	8,538			1,730,627						
Schedule E-19-V T	13,473			5,510,818						
Total Annual	22,011			7,241,445	0.451	0.366	9,239.3	7,050,081	1.045	0.000
Average Monthly	1,834									
Annual Maximum		2,256	1.23				769.9			
Small Standby @ Primary Distribution										
Schedule A-10 P	341,233	36,738		92,696,043						
Schedule E-19-V P	290,352	35,412		122,237,803						
Total Annual	631,585			214,933,846	0.466	0.340	14,723.4	2,202,592	0.205	0.135
Average Monthly	52,632									
Annual Maximum		72,150	1.37				1,227.0			
Small Standby @ Secondary Distribution										
Schedule A-10 S	39,634,639	4,136,105		11,421,844,811						
Schedule E-19-V S	12,467,954	1,284,349		5,677,043,352						
Total Annual	52,102,593			17,098,888,163	0.450	0.360	25,557.1	550,706	0.030	0.331
Average Monthly	4,341,883									
Annual Maximum		5,420,454	1.25				2,129.8			
Large Standby @ Transmission										
Schedule E-19 T	13,789			5,918,732						
Schedule E-20 T	12,415,870			6,140,437,729						
Schedule A-RTP-20 T	3,363,125			74,000,004						
Total Annual	15,792,784			6,220,356,465	0.540	0.439	6,629,150.7	216,773,737	0.045	0.394
Average Monthly	1,316,065									
Annual Maximum		1,618,584.4	1.23				552,429.2			
Large Standby @ Primary Distribution										
Schedule E-19 P	1,320,962	158,431		534,824,662						
Schedule E-20 P	13,840,424	1,385,923		6,420,664,851						
Total Annual	15,161,386			6,955,489,513	0.628	0.514	650,342.6	7,034,632	0.015	0.499
Average Monthly	1,263,449									
Annual Maximum		1,544,354	1.22				54,195.2			

Large Standby @ Secondary Distribution

Rate Group	Maximum Billing Demand (kW) (a)	NonCoincident Demand (kW) (b)	Ratio (c)	Energy Sales (kWh) (d)	Billing Load Factor (e)	NonCoinc Load Factor (f)	Standby Contract Demand (kW) (g)	Standby Energy (kWh) (h)	Standby Load Factor (i)	Net Load Factor (j)
Schedule E-19 S	9,564,526	1,141,305		3,674,880,718						
Schedule A-RTP-19 S (RTMS)	116,958	13,852		53,000,820						
Schedule E-20 S	8,410,071	870,108		3,660,375,294						
Schedule A-RTP-20 S (RTLS)	958,012	92,966		358,440,492						
Total Annual	19,049,567			7,746,697,324	0.557	0.417	22,494.9	3,831,231	0.233	0.184
Average Monthly	1,587,464									
Annual Maximum		2,118,231	1.33				1,874.6			
Total Primary & Secondary	7,245,428	9,155,189	1.23							
Total Transmission, Primary, & Secondary							612,625.7			

Data Source: Pacific Gas and Electric Company, 1999 Test Year General Rate Case - Phase 2 (CPUC Docket A.99-03-014)
Exhibit (PG&E-7), Workpapers Supporting Revenue Allocation, Volume 1, Chapters 2 and 3, March 5, 1999
Column (a): Sum of summer and winter maximum kW billing demand: pp. 2-100 to 2-107
Column (b): For primary and secondary distribution voltages: final line transformer loads (kW), from pp. 2-68 to 2-69, are used as non-coincident demands.
     For transmission voltage: Because final line transformer loads are not used in revenue allocation for transmission voltage, the ratio of
     non-coincident demand to maximum billing demand is derived from the sums of non-coincident and billing demands for full service customers.
Column (c): Annual maximum (non-coincident) demand from column (b), divided by average monthly billing demand from column (a)
Column (d): Total sales forecast (kWh): pp. 2-100 to 2-107 and pp. 2-113 to 2-118
Column (e): Total sales forecast (column d) divided by 8760 hours per year, divided by average monthly billing demand (column a)
Column (e): Total sales forecast (column d) divided by 8760 hours per year, divided by non-coincident demand (column b)
Column (g): Standby contract demand: p. 2-104. For transmission voltage, the total annual billing determinant of 6,638,390 MW-months is proportioned
     is by the monthly billing demand of full service customers. For primary and secondary distribution voltages, total annual billing determinants
     of 665,066 and 48,052 MW-months, respectively, are proportioned by the following final line transformer loads of standby customers at each
     voltage level, obtained from pp. 2-68 to 2-69:

	Small	Large
Primary	592	26149
Secondary	2003	1763

Column (h): Total sales forecast for delivery to standby customers, p. 2-15
Column (i): Total sales forecast for delivery to standby customers (column h) divided by 8760 hours per year, divided by standby contract demand (column g)
Column (j): Non-coincident load factor (column f) minus standby load factor (column i)

Southern California Edison

Rate Group	Maximum Billing Demand (kW) (a)	NonCoincident Demand (kW) (b)	Ratio (c)	Energy Sales (kWh) (d)	Billing Load Factor (e)	NonCoinc Load Factor (f)	Standby Contract Demand (kW) (g)	Standby Energy (kWh) (h)	Standby Load Factor (i)	Net Load Factor (j)
GS-2										
Total Annual	81,372,200			25,302,724,700	0.426	0.347	95.3		0.271	0.076
Average Monthly	6,781,017									
Annual Maximum		8,330,697.8	1.23				7.9			
TOU-8-SEC										
Total Annual	22,170,600			9,041,681,500	0.559	0.467	178.1		0.233	0.234

Average Monthly	1,847,550								
Annual Maximum		2,210,931.8	1.20				14.8		
TOU-8-PRI									
Total Annual	15,775,000			7,752,979,500	0.673	0.484	1,229.6	0.015	0.470
Average Monthly	1,314,583								
Annual Maximum		1,826,841.5	1.39				102.5		
TOU-8-SUB									
Total Annual	13,851,400			8,472,773,800	0.838	0.674	6,078.7	0.045	0.629
Average Monthly	1,154,283								
Annual Maximum		1,435,834.7	1.24				506.6		
Total Primary & Secondary	9,943,150	12,368,471.1	1.24						

Data Source: Southern California Edison Company, Application for approval of new rates to be implemented at the end of the rate freeze period
        (CPUC Docket A.00-01-009)
Post-Transition Rate Design Proposals, Workpapers, Volume 2 of 2, July 2000
Column (a): "Max. MW" from Section III. Revenue Allocation & Rate Design, Forecasted 2002 Billing Determinants
Column (b): "Total Non-Coincident Customer Peaks" from Section III. Revenue Allocation & Rate Design, Customer Load Study
Column (d): "Total MWh" from Section III. Revenue Allocation & Rate Design, Customer Load Study
Column (g): "Strandby MW" from Section III. Revenue Allocation & Rate Design, Forecasted 2002 Billing Determinants
Column (h) is not available for SCE, thus PG&E's values are used for SCE. The value for GS-2 is calculated from the total contract demand and standby
        energy deliveries for PG&E's small standby customers.
Other columns are calculated from the listed inputs, as was done with the data for PG&E.

San Diego Gas & Electric

SDG&E's standby data has been provided to the ISO in response to a data request.
Standby energy deliveries are not available for SDG&E, thus the load factor adjustmwent is calculated from the total contract demand and standby
energy deliveries for PG&E's small and large standby customers.

	Standby Contract Demand (kW)	Standby Energy (kWh)	Standby Load Factor
Small Standby @ Transmission	769.9	7,050,081	
Small Standby @ Primary Distribution	1,227.0	2,202,592	
Small Standby @ Secondary Distribution	2,129.8	550,706	
Total Small Standby	4,126.7	9,803,379	0.271
Large Standby @ Transmission	552,429.2	216,773,737	
Large Standby @ Primary Distribution	54,195.2	7,034,632	
Large Standby @ Secondary Distribution	1,874.6	3,831,231	
Total Large Standby	608,499.0	227,639,600	0.043