BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Revise General Order 156 to Include Certain Electric Service Providers and Community Choice Aggregators and Encourage Voluntary Participation by Other Non-Utility Entities Pursuant to Senate Bill 255; Consider LGBT Business Enterprise Voluntary Target Procurement Percentage Goals; Incorporate Disabled Business Enterprises; Modify the Required Reports and Audits; and Update Other Related Matters.

R.21-03-010

CALIFORNIA COMMUNITY CHOICE ASSOCIATION’S COMMENTS ON ORDER INSTITUTING RULEMAKING TO REVISE GENERAL ORDER 156 – SUPPLIER DIVERSITY PROGRAM

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SUMMARY OF RECOMMENDATIONS

- Expand the set of diverse suppliers in the General Order (GO) 156 Clearinghouse to include small businesses from the California Department of General Services (DGS) database (specifically, certified Small Business and Small Businesses for the Purpose of Public Works).

- Hold informal workshops among load-serving entities (LSEs), generators, and other suppliers to consider measures to increase diversity in electricity supply spending, contracting, and subcontracting.

- Modify the reporting templates to better recognize Community Choice Aggregators’ (CCA) supplier diversity efforts.
The California Community Choice Association\(^1\) (CalCCA) submits these Comments in response to the Order Instituting Rulemaking to Revise General Order 156 – Supplier Diversity Program (OIR), issued March 23, 2021, pursuant to Rule 6.2 of the California Public Utilities Commission’s (Commission’s) Rules of Practice and Procedure (Rules) and the directives provided by the OIR.

I. INTRODUCTION

CCAs support the purpose of the Commission’s GO 156 program. CalCCA appreciates the opportunity to help inform the Commission’s implementation of Senate Bill (SB) 255, which

places two distinct requirements on CCAs with gross annual revenues exceeding $15 million.\(^2\)

These CCAs must:

- **Submit a detailed and verifiable plan** to the commission for increasing procurement from *small, local, and diverse business enterprises* in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects.\(^3\)

- **Submit a report** to the Commission regarding its procurement from *women, minority, disabled veteran, and LGBT business enterprises* in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects.\(^4\)

Aside from these two specific and precise planning and reporting requirements, SB 255 places no other direct responsibility on CCAs or the Commission in addressing CCA supplier diversity.

These comments aim to provide an understanding of the CCA context that must be addressed in implementing these provisions, along with recommendations for ways to better incorporate CCA efforts and success in diversifying their procurement into the Commission’s planning and reporting framework. These comments also focus on the challenges faced by CCAs and investor-owned utilities (IOUs) alike in diverse electricity supply procurement and propose several recommendations to address this issue.

**II. BACKGROUND**

All CCAs with annual gross revenue exceeding $15 million, as required under Public Utilities Code Section 366.2(m)(1), submitted initial Supplier Diversity Reports for 2020 and Supplier Diversity Plans for 2021, as required under SB 255.\(^5\) The CCAs, to the extent they could verify the data, provided the required information on procurement from women, minority,

\(^2\) SB 255 SEC.2. Section 8283 (a) of the Public Utilities Code.
\(^4\) Id., §366.2(m)(2)(emphasis supplied).
\(^5\) Reports are available at [https://www.cpuc.ca.gov/supplierdiversity/](https://www.cpuc.ca.gov/supplierdiversity/).
disabled veteran, lesbian, gay, bisexual, transgender business enterprises (WMDVLGBTBE) in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects.

CalCCA members participated in direct conversations and a workshop with Commission staff to better understand how CCAs could best present their existing efforts at promoting supplier diversity and aligning their procurement plans with California’s goals. In response to CCA correspondence requesting information on how CCAs could use existing GO 156 reporting templates, Commission staff sent an e-mail on April 1, 2020 containing useful templates and a checklist that explained which GO 156 reporting categories were applicable to CCAs and which were not. This checklist is included in Appendix A-2 of these comments. The Commission hosted a workshop on December 16, 2020 to explain how CCAs could use existing GO 156 templates to satisfy their SB 255 reporting and planning requirements and answered further questions from CCAs through e-mail correspondence. The CCAs that participated in these meetings and conversations benefited greatly from the information provided by Commission staff and view this proceeding as an opportunity to extend the work that CCAs have already begun in concert with the Commission.

The CCAs exerted tremendous effort to gather the information required in GO 156, contacting vendors, sending vendor surveys, consulting the Commission’s Supplier Clearinghouse, searching the DGS Disabled Veterans Database, and cross-referencing DGS Small Business and Micro Business databases for qualified vendors. Yet despite these efforts, the CCA GO 156 report templates contain many blanks or zero notations. CalCCA recognizes the lack of diversity that this data shows and looks forward to working with stakeholders to improve contracting with small, local, and diverse businesses.
CCAs are making significant expenditures on diverse sources in a range of categories. As discussed in Section III.B however, supplier diversity in electricity supply procurement is lagging. The collective results are presented in Table 1 below, collated from the CCA reports.

Table 1: CCA Diverse Spend, by SIC code

<table>
<thead>
<tr>
<th>SIC Code</th>
<th>SIC Description</th>
<th>CCAs</th>
<th>Diverse Spend</th>
<th>Total Spend</th>
<th>Diverse %</th>
</tr>
</thead>
<tbody>
<tr>
<td>87</td>
<td>Engineering &amp; Mgmt. Services</td>
<td>11</td>
<td>$946,384</td>
<td>$3,092,100</td>
<td>31%</td>
</tr>
<tr>
<td>81</td>
<td>Legal Services</td>
<td>2</td>
<td>$67,581</td>
<td>$1,092,674</td>
<td>6%</td>
</tr>
<tr>
<td>27</td>
<td>Printing &amp; Publishing</td>
<td>4</td>
<td>$374,337</td>
<td>$517,159</td>
<td>72%</td>
</tr>
<tr>
<td>50</td>
<td>Wholesale Trade Durable Goods</td>
<td>4</td>
<td>$51,412</td>
<td>$192,632</td>
<td>27%</td>
</tr>
<tr>
<td>62</td>
<td>Security &amp; Investment</td>
<td>1</td>
<td>$4,310</td>
<td>$61,803</td>
<td>7%</td>
</tr>
</tbody>
</table>

These results demonstrate that CCAs are on the right track, despite the challenges that will be discussed in the next section.

III. SEVERAL FACTORS MUST BE CONSIDERED IN CCAS’ EFFORTS TO INCREASE SUPPLIER DIVERSITY

The sections below describe challenges that CCAs face in expanding their diverse procurement spend. As described below, CalCCA is committed to working with stakeholders to address these problems and propose solutions to increase supplier diversity.

A. Proposition 209 Places Additional Restrictions on CCAs That Do Not Apply to IOU Procurement

The CCAs provided their reports while navigating the challenges of supporting diversity within the confines of Proposition 209, which the voters passed as a California constitutional amendment on November 5, 1996. The measure added Section 31 to Article I of the California Constitution, which orders that “…the state cannot discriminate against or grant preferential treatment on the basis of race, sex, color, ethnicity, or national origin in the operation of public employment, public education, and public contracting.”6 In Section 31(f), Article I explains that

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“state” includes “any city, county, city and county, public university system, including the University of California, community college district, school district, special district, or any other political subdivision or governmental instrumentality of or within the state.” The Legislature acknowledged these limitations on CCA procurement in enacting SB 255.7

CCAs are either a program offered by a single city or county, or a Joint Powers Authority formed by multiple local governments. As such, CCAs are defined as local governments, and so must comply with Proposition 209’s constitutional directive. This means that contract awards must be based upon criteria such as low bid and the ability to meet project/procurement requirements. Thus, CCAs are legally prohibited from participating in certain aspects of the existing GO 156 requirements, such as setting long-term procurement targets of not less than 15 percent for minority owned business enterprises and not less than 5 percent for women owned business enterprises, pursuant to Section 8.2 of GO 156.8 For best practice compliance with Proposition 209, CCA procurement should be complete, and the contract awarded, before a CCA can survey a vendor regarding any certification or qualification under Public Utilities Code Section 366.2(m)(2)(A)9 or the Supplier Clearinghouse as it relates to WMDVLGBTBE status.

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7 See Senate Floor Analysis, Sept. 3, 2019, at 5-6, available at https://trackbill.com/bill/california-senate-bill-255-women-minority-disabled-veteran-and-lgbt-business-enterprise-procurement-electric-service-providers-energy-storage-system-companies-community-choice-aggregators/1685899/. “California’s Proposition 209 prohibits the State from discriminating against or granting preferential treatment to any individual or group on the basis of race, sex, color, ethnicity, or national origin in the operation of public employment, public education, or public contracting. The proposition limits the degree to which any governmental entity within California, including CCAs, can compel information about certain protected classes to support contract decision-making.”

8 GO 156 text, Section 8.2, available at https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M152/K827/152827372.pdf.

9 https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&sectionNum=366.2 Section (2)(A) states: “The commission shall require each community choice aggregator with gross annual revenues exceeding fifteen million dollars ($15,000,000) to annually submit a report to the commission regarding its procurement from women, minority, disabled veteran, and LGBT business enterprises in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects.”
Once this information is collected, the CCA should take appropriate measures to keep this information out of any discussion of procurement to avoid violating Proposition 209.

CalCCA notes that GO 156, which governs IOU supplier diversity, was developed with IOUs in mind. The IOUs, however, do not face these same Prop 209 constraints, as they are not public agencies. To bridge the differences inherent in IOU and CCA opportunities, CalCCA offers recommendations in Section IV.

B. 94 Percent of CCA Procurement Dollars Are Spent on Electricity Supply, Which Has a Relatively Small Pool of Diverse Suppliers

Nine of fourteen CCAs, representing 86 percent of total procurement among all CCAs, reported their total power procurement spend in their SB 255 reports. Among these nine CCAs, total procurement spend was $2.7 billion dollars, and total power procurement spend was $2.5 billion dollars. Assuming this relationship holds for the remaining CCAs, roughly 94 percent—the overwhelming majority—of a CCA’s annual budget goes to power procurement.

A review of the Commission’s Clearinghouse reveals that power procurement has a very small pool of qualifying WMDVLGBTBE suppliers. Of the roughly 8,800 suppliers in the Commission’s Clearinghouse, only 27 could be identified as relating to electricity generation. This small pool of suppliers means that it is challenging for all LSEs, including CCAs, to increase their diverse power procurement spend. It is especially difficult for CCAs, because unlike IOUs whose spending is focused largely on infrastructure, the vast majority of CCAs’ budget is spent on power procurement.

10 “Relating to electricity generation” is here defined as having SIC codes 4911 (Electric Services), 4931 (Electric and Other Services Combined), or 4939 (Combination Utilities, Not Elsewhere Classified), and also having power generation listed under their capabilities. For more information, see Appendix A-1.
C. CCAs May Also Be Subject to Other State and Local Government Directives That Must Be Harmonized with GO 156

As local governments, CCAs set procurement policies consistent with the direction of their Boards, which consist of elected representatives from their member jurisdictions. Consequently, different CCAs may have different such policies, which often include bidding and contract award requirements that may not easily be reconcilable with the requirements of GO 156. Examples of these policies are provided below:

- Selection of the “lowest responsible bidder,” which means that bidder who best responds in price, quality, service, fitness, or capacity to the requirements.
- Local preference to support businesses that are located within or near the CCA’s service territory.
- Some CCAs procured from certified small businesses and micro businesses recognized by the DGS.
- Preference for union labor.11

CCAs thus are bound to consider not only the limitations of Proposition 209 but limitations imposed by their governing authorities.

D. CCAs Engage in Diverse Spending Beyond the Supplier Clearinghouse

To define supplier diversity, GO 156 relies exclusively upon the Supplier Clearinghouse database. However, this database is incomplete—it does not include suppliers that could be certified, but may be unaware of the Clearinghouse or may not know how to navigate the certification process. Several CCAs have committed to supporting their eligible but not yet GO156 certified contractors in obtaining certification. Indeed, East Bay Community Energy (EBCE) flags this issue and their commitment in its report:

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Given the unique set of vendors EBCE works with, many do not hold contracts with the investor-owned utilities and were unaware of GO 156. When we distributed our survey, we quickly discovered the socialization of the program and the Supplier Clearinghouse was highly informative to many of our vendors. A number of eligible vendors noted their status and interest in pursuing certification as a result of learning of GO 156 and the Supplier Clearinghouse. We will offer them support in their pursuit of certification.12

In addition, as discussed further below, CCAs may rely on the California DGS database of certified Small Business and Small Businesses for the Purpose of Public Works (DGS database). The DGS database provides access to small and local businesses, consistent with the requirement of §366.2(m)(1). Access to this database has become increasingly important to allow CCAs to provide small, local business support in the face of the economic strain placed on these enterprises by the COVID-19 pandemic.

IV. RECOMMENDATIONS

CalCCA proposes the following solutions both to increase the scope of diverse suppliers and to increase diverse spending.

First, CalCCA recommends broadening the set of diverse suppliers that can be included in CCA reports to include the full California DGS database of certified Small Business and Small Businesses for the Purpose of Public Works.13 In addition to being the certifying entity for Disabled Veteran Business Enterprises (DVBEs), the DGS Database is well suited to CCA requirements to increase procurement from “small, local, and diverse business enterprises.”14 CalCCA further notes that the COVID-19 crisis, and resulting economic devastation, makes

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13 A search tool for diverse businesses is available at the following address: https://caleprocure.ca.gov/pages/PublicSearch/supplier-search.aspx
encouraging contracts with small businesses who are struggling with economic recovery even more important.\textsuperscript{15}

Second, CalCCA recommends that the Commission consider changes in the plan and reporting templates that enable a broader examination of the supplier diversity efforts undertaken by CCAs. Reporting template requirements should capture procurement from small and local businesses to align with CCA planning obligations under SB 255 and their business model to serve their community and customers. CalCCA intends to develop and propose these alternatives as the proceeding unfolds. Examples of such changes can be seen in the Pioneer Community Energy 2020 report and are presented in Appendix A-3 for illustration.

Third, CalCCA recommends a workshop and ongoing dialogue among LSEs, generators, and other suppliers to address the lack of diversity in LSE procurement. These workshops should discuss the following issues:

- LSE power procurement often involves “turnkey” projects, where the vendor or marketer of the generation, not the LSE, chooses the contractor and subcontractor. These vendors and marketers will need to increase the diversity of their contractors and subcontractors, recognizing that CCAs themselves may not require, but may encourage their suppliers to procure from diverse businesses.

- Determine if there are ways to get more contractors and subcontractors certified as diverse businesses.

- Clarify how joint CCA procurement is shared through contractual agreements. Currently, the CCA that holds the contract for a Power Purchase Agreement (PPA) reports all the expenditure related to that contract, even though that expenditure may be split between one or more CCAs.

V. PROCEDURAL MATTERS

The OIR’s preliminary issues list provides ample room for consideration of the issues identified in these comments. In particular, CalCCA’s comments are responsive to the first and fourth identified issues.16

CalCCA questions the categorization of this rulemaking as “ratesetting.” Rule 1.3 of the Commission’s Rules define ratesetting proceedings as follows:

(f) "Ratesetting" proceedings are proceedings in which the Commission sets or investigates rates for a specifically named utility (or utilities), or establishes a mechanism that in turn sets the rates for a specifically named utility (or utilities). "Ratesetting" proceedings include complaints that challenge the reasonableness of rates or charges, past, present, or future. Other proceedings may be categorized as ratesetting, as described in Rule 7.1(e)(2).

The proceeding scope does not expressly or implicitly set rates for any utility. More suited is the designation of “quasi-legislative,” which the Commission’s Rules define as “proceedings that establish policy or rules (including generic ratemaking policy or rules) affecting a class of regulated entities, including those proceedings in which the Commission investigates rates or practices for an entire regulated industry or class of entities within the industry.”

Finally, CalCCA agrees that there is no need for a hearing at this time.

16 R.21-03-010 Rulemaking at 17. Issue 1: “How should the Commission revise the Supplier Diversity Program set forth in General Order 156 to implement SB 255? Issue 4: “Other Revisions. Whether the Commission should consider other revisions to General Order 156, including additions to the required contents of the utility annual reports regarding the Supplier Diversity Programs, such as quantifying economic impact and work force and corporate board diversity data, increasing the number of internal Commission audits of the Supplier Diversity Program, and clarifying the complaint and En Banc hearing process set forth in General Order 156?”
VI. CONCLUSION

For all the foregoing reasons, CalCCA requests that the Assigned Commissioner and Administrative Law Judge adopt a scope for this rulemaking that includes all of the issues identified herein.

Respectfully submitted,

Evelyn Kahl
General Counsel to the California Community Choice Association

April 12, 2021
APPENDIX A-1: ELECTRICITY PROCUREMENT SUPPLIERS FROM CLEARINGHOUSE

CalCCA generated this list of suppliers by querying The Supplier Clearinghouse Certified Directory at https://sch.thesupplierclearinghouse.com/ for SIC codes 4911, 4931, and 4939 which specifically mention electric generation. This query returned 66 unique firms. However, not all of them generate electricity. Investigating the advertised capabilities of the companies revealed that 39 of the 66 provide consulting, engineering, or manufacturing services related to electricity generation, but do not sell power themselves. The table below shows the remaining 27.

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Address</th>
<th>Cert</th>
<th>Capability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Angstrom Energy Solutions LLC</td>
<td>1505 Elm St, Dallas, TX</td>
<td>WBE</td>
<td>Deliver energy storage solutions and related products such as UPS and DC Power systems, Batteries, Chargers, Generators, Fuel Cells, Controls, and Lighting to fulfill the needs and delivery to various industries</td>
</tr>
<tr>
<td>BioUrja Trading, LLC</td>
<td>1080 Elridge Pkwy</td>
<td>MBE</td>
<td>Biofuels trading company specializing in supplying ethanol, crude, and refined products to major oil companies, mid-size oil companies and retailers, various end users. We trade power, natural gas, FTRs.</td>
</tr>
<tr>
<td>Clearview Energy</td>
<td>1201 Elm Street</td>
<td>LGBTBE</td>
<td>Reseller/Supplier of natural gas and electricity;</td>
</tr>
<tr>
<td>Crown Electrical Corp.</td>
<td>13423 Garvey Avenue</td>
<td>WMBE</td>
<td>Electrical Construction. Power system installation, such as SWBD, electrical panel, electrical device installation; Lighting system &amp; lighting control system installation; Emergency backup system installation, such as generator, UPS, Inverter installation; Energy Efficiency power design/installation: Such as solar system design/installation. Electrical vehicle charging station design and construction.</td>
</tr>
<tr>
<td>Delano Energy Center, LLC</td>
<td>650 Bercut Drive</td>
<td>WBE</td>
<td>Development, construction, ownership and operations of power generation facilities</td>
</tr>
<tr>
<td>Company Name</td>
<td>Address</td>
<td>Cert</td>
<td>Capability</td>
</tr>
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<td>----------------------------------</td>
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<td>---------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>NG Power, LLC</td>
<td>13374 Sumter St. Fontana, CA</td>
<td>MBE</td>
<td>NG Power, LLC is an engineering firm that provides expertise to plan, and design &amp; implement to our client's most complex engineering projects.</td>
</tr>
<tr>
<td>RDAF Energy Solutions, LLC</td>
<td>1147 Marsh Road, Charlotte, NC</td>
<td>MBE</td>
<td>Consultation and supply of energy products and supplies; i.e. Natural Gas, Power, Energy Asset Management Services, Liquified Natural Gas</td>
</tr>
<tr>
<td>Shake Energy Collaborative, P.B.C.</td>
<td>1464 N Wishon Ave Fresno, CA</td>
<td>WBE</td>
<td>Public benefit corporation that enables communities to design and own their own energy resources. Once Shake develops the project according to the community's design, this asset will generate low-carbon energy and financial savings that can be invested back into the community.</td>
</tr>
<tr>
<td>Stanton Energy Reliability Center, LLC</td>
<td>650 Bercut Dr., Sacramento, CA</td>
<td>WBE</td>
<td>The development, installation, and operation of integrated gas fired peakers and battery energy storage.</td>
</tr>
<tr>
<td>Ksulilmumal Akalmukwaits Incorporated</td>
<td>110 Main Street, Ste. 304 Polson, MT</td>
<td>MBE</td>
<td>Independent Power Producer which buys and sells electricity and transmission related products throughout the Western US power markets.</td>
</tr>
<tr>
<td>Vanir Energy, LLC</td>
<td>4540 Duckhorn Drive, Suite 100</td>
<td>WMBE</td>
<td>Design, procurement, installation, financing, operation, and maintenance of alternative energy systems; with an emphasis on solar photovoltaic systems and energy efficient lighting retrofits.;</td>
</tr>
<tr>
<td>W Power, LLC</td>
<td>650 Bercut Drive Sacramento, CA</td>
<td>WBE</td>
<td>Development, construction, ownership and operations of electrical power generation facilities.</td>
</tr>
<tr>
<td>WTBK Investments LLC</td>
<td>833 1/2 W 40th Pl Los Angeles, CA</td>
<td>MBE</td>
<td>Real Estate and Renewable Power Generation Fund Formation and Management. Raising capital and then structuring deals to solve housing and electricity generation issue and add value to private placements.</td>
</tr>
<tr>
<td>X UTILITY</td>
<td>114 E. Shaw Suite 103 Fresno, CA</td>
<td>WBE</td>
<td>We specialize in grid tie interconnection, SGIA and LGIA FERC Tariff interpretation, utility impact studies review and maintain utility interconnection requirements. Our cutting edge products and services and automate utility, ISO and Developer workflows to provide a clear and impartial X Ray of project dependencies and real-time execution status.</td>
</tr>
<tr>
<td>Fast Track Engineering Contractor Inc.</td>
<td>5835 W. Vine Ave. Visalia, CA</td>
<td>MBE</td>
<td>Design/Build plans for overhead and underground electrical distribution and transmission systems, design the infrastructure for the electrical grid. Vaults, manholes, pull boxes and duct banks. Civil construction to install the underground and infrastructure, vaults, duct banks, manholes etc.</td>
</tr>
<tr>
<td>Foothill Electric, Inc</td>
<td>12122 Dry Creek Rd Auburn, CA</td>
<td>WBE</td>
<td>Electrical service work, new construction, commercial, industrial and residential, remodel all types of electrical and solar (PV) work.</td>
</tr>
<tr>
<td>Grace Industries</td>
<td>4401 Atlantic Ave #200 Long Beach, CA</td>
<td>LGBTBE</td>
<td>solar power generation, logistics, warehousing, distribution, transportation, recycling, waste collection, transportation consulting, logistics consulting, freight services, hazardous waste removal &amp; disposal</td>
</tr>
<tr>
<td>Company Name</td>
<td>Address</td>
<td>Cert</td>
<td>Capability</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>----------------------------------------</td>
<td>------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Grid Resources Corporation</td>
<td>338 Spear Street, Unit 22E</td>
<td>MBE</td>
<td>Control and management of demand response, energy efficiency, energy storage and distributed generation resources.</td>
</tr>
<tr>
<td>Preferred Power Solutions Inc</td>
<td>1400 Easton Dr #116 BAKERSFIELD, CA</td>
<td>WBE</td>
<td>Power Industry, Heavy Industrial, High Voltage DC Power Plants, Substations &amp; Switch Yards, Alternative Energy, Water Treatment.</td>
</tr>
<tr>
<td>Red Dipper, Inc</td>
<td>1166 SHAFTER AVE, STE. C SAN FRANCISCO, CA</td>
<td>MBE</td>
<td>Electrical Installation, Solar, Energy Efficiency and Supplies;</td>
</tr>
<tr>
<td>RF Solar &amp; Green Energy, Inc.</td>
<td>1100 S. Hope St., Suite #103 Los Angeles, CA</td>
<td>MBE</td>
<td>Design and develop photovoltaic solar systems for residential and commercial facilities, ensuring compliance with all government policies and regulations. Manage all aspects of residential and commercial building renovations and build-outs to include swimming pools for public utilities projects.</td>
</tr>
<tr>
<td>WBE Supply Solutions, Inc.</td>
<td>3017 Starry Night Drive Escondido, CA</td>
<td>WBE</td>
<td>WBE Supply Solutions, Inc. is an electrical wholesaler that specialized in custom electrical distribution equipment, such as padmount and substation low/medium voltage transformers, switchboards, switchgear, and power quality products. Manufacturers include IEM, VanTran Transformers, Rex Power Magnetics, Staco Energy Products, and Tavrida.</td>
</tr>
<tr>
<td>Western Utility Solutions, Inc</td>
<td>50 Langford lane Ladera Ranch, CA</td>
<td>WBE</td>
<td>Utility; Wholesale utility distribution products</td>
</tr>
</tbody>
</table>
APPENDIX A-2: GO 156 UTILITY ANNUAL REPORT CHECK LIST - CCAS

The California Public Utilities Commission’s (CPUC) General Order (GO) 156 utility annual reports should contain at least the elements below.

Descriptions:

1. Description of WMDVLGBTBE program activities (GO 156, §9.1.1):
   - Internal and external activities
   - Amount of funding on technical assistance to small/diverse businesses

2. A description (to the extent possible) of the number of WMDVLGBTBEs who have the majority of their workforce working in California (GO 156, §9.1.2)

3. A description of progress in meeting or exceeding set goals and an explanation of why goals are not met (GO 156, §9.1.4) {Not applicable to CCA's}

4. A description of prime contractors progress in increasing the participation of WMDVLGBTBE subcontractors (GO 156, §9.1.5 and §6.3.7)
   - Each utility may include awards to verified WMDVLGBTBE subcontractors (GO 156, §6.3.9)

5. A list, description, and status of WMDVLGBTBE complaints (GO 156, §9.1.6)

6. A description of efforts made to recruit WMDVLGBTBE suppliers in underutilized and highly technical categories (GO 156, §9.1.7) {Not applicable to CCA's}

7. Each utility that elects to report fuel procurement separately shall provide (GO 156, §9.1.11):
   - An explanation of how existing and/or changing market conditions are affecting the utility's ability to meet or exceed its WMDVLGBTBE goals for fuel;
   - A comprehensive description of the specific out-reach programs used to seek WMDVLGBTBE fuel suppliers in each market in which fuel is purchased; and
   - A justification for any exclusion of a specific fuel category from the utility's fuel procurement base.

8. A description of WMDVLGBTBE program activities planned for the next calendar year (GO 156, §10.1.2):
   - Internal and external activities

9. Plans for recruiting WMDVLGBTBE suppliers (GO 156, §10.1.3): {Not applicable to CCA's}
   - In underutilized categories
   - In highly technical areas
10. Plans for recruiting WMDVLGBTBE suppliers in currently unavailable areas (GO 156, §10.1.4) {Not applicable to CCA's}

11. Plans for encouraging prime contractors to subcontract with WMDVLGBTBE suppliers (GO 156, §6.3.8 and §10.1.5) {Not applicable to CCA's}

12. Plans for complying with the WMDVLGBTBE program guidelines established by the Commission as required by Public Utilities Code §8283(c) (GO 156, §10.1.6) {Not applicable to CCA's}

13. In the annual plans, for LGBTBEs, the utilities shall comply with GO 156, §10 and §8.3 (GO 156, §10.2)

Tables:

1. Utilities shall report (GO 156, §9.1.2; D.11-05-019; & D. 06-11-028):
   - WMDVLGBTBE purchases and/or contracts with breakdowns in the following categories compared with the total utility contract dollars awarded:
     - by ethnicity
     - by product and service categories
     - Total number of WMDVLGBTBEs with contracts
     - The dollars awarded to WMDVLGBTBEs
     - The number of WMDVLGBTBEs that received direct spend

2. An itemization of WMDVLGBTBE program expense (GO 156, §9.1.3)

3. A summary of prime contractor utilization of WMDVLGBTBE subcontractors (GO 156, §9.1.5)

4. A summary of WMDVLGBTBE purchases and/or contracts in product and service categories that include renewable and non-renewable energy, wireless communications, broadband, smart grid, rail projects and electronic procurement (GO 156, §9.1.9)
   - Utilities shall report renewable and non-renewable energy procurement in a similar manner as fuel procurement reporting

5. Each utility which elects to report fuel procurement separately must have a separate detailed and verifiable report on WMDVLGBTBE participation in fuel markets. These reports must include, at a minimum, the results of purchases in each fuel category (GO 156, §9.1.11)
   - Each utility shall report purchases by:
     - Market origin and fuel type
     - Volume and dollar magnitude
     - Term of sale, e.g., spot, intermediate, long term and
     - Ethnicity and gender of the supplier

6. GO 156 utilities’ Annual Plan shall contain (GO 156, §10.1.1):
   - Short, mid, and long term goals
- Short-term (one year), mid-term (three years), and long-term (five years) goals for the utilization of WMLGBTBEs (GO 156, §8)
- Goals shall be set annually for each major product and service categories (GO 156, §8 and §8.6)
- Goals shall be established for both minority and non-women-owned business enterprises (GO 156, §8.5) {Not applicable to CCA's}
APPENDIX A-3: EXAMPLES OF TEMPLATE ADDITIONS

In addition to the standard set of tables in the CPUC reporting template, Pioneer Community Energy included other tables that more broadly reflect its efforts to diversity spending to support small and local business enterprises. Examples include:

**Pioneer Supplier Summary**

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local</td>
<td>64</td>
<td>40%</td>
</tr>
<tr>
<td>In State[^1]</td>
<td>70</td>
<td>43%</td>
</tr>
<tr>
<td>Out of State</td>
<td>26</td>
<td>16%</td>
</tr>
<tr>
<td>Out of US</td>
<td>1</td>
<td>&gt;1%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>161</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

[^1] In State includes business in the neighboring counties of El Dorado, Nevada County and Sacramento, which could be classified as regional. Pioneer chose a strict definition of local meaning within Placer County.
<table>
<thead>
<tr>
<th>SIC Category</th>
<th>Male</th>
<th>Female</th>
<th>Male</th>
<th>Female</th>
<th>Male</th>
<th>Female</th>
<th>MBE</th>
<th>WBE</th>
<th>LGBTBE</th>
<th>DVBE</th>
<th>WMDV/GBTBE</th>
<th>Dollars</th>
</tr>
</thead>
<tbody>
<tr>
<td>2799 - Commercial Printing</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$10,769.00</td>
<td>$11,830.96</td>
</tr>
<tr>
<td>%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>91.02%</td>
<td>91.02%</td>
</tr>
<tr>
<td>7341 - Building Cleaning &amp; Maintenance</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$9,326.00</td>
<td>$9,326.00</td>
</tr>
<tr>
<td>%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
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<td>0.0%</td>
<td>0.0%</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

Total Product Procurement: $11,830.96
Total Service Procurement: $9,326.00
Net Procurement**: $21,156.96