Supplier Diversity 2021 Annual Report

Report to the California Public Utilities Commission

Desert Community Energy March 1, 2022





COMMUNITY

ENERGY

The **POWER** of choice

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2021 Annual Report

Desert Community Energy (DCE) is a local government, not-for-profit Joint Powers Authority established in 2017 to provide a Community Choice Aggregation program for member agencies. Current members are the cities of Palm Springs and Palm Desert. DCE began serving load in the City of Palm Springs in April 2020, serving approximately 40,000 residential, commercial, industrial, and agricultural accounts. DCE's goals include: 1) reducing greenhouse gas emissions related electricity use; 2) providing electric generation at competitive, stable rates; 2) offering programs to reduce energy consumption; and 3) stimulating and sustaining the local economy by developing local jobs in renewable energy; and promoting long-term electric rate stability, energy security, and reliability for customers through local control of electric generation resources.

In this second year of submitting the GO 156 report, DCE continues to expand our understanding of the GO156 requirements and the opportunities to diversify our procurement. DCE is committed to furthering equal access to economic opportunity for business enterprises owned by women, minorities, disabled veterans, lesbian, gay, bisexual, transgender (WMDVLGBT) and other underserved or marginalized groups. DCE also continues efforts to include local and small businesses in our procurement. The majority of DCE's purchases are power contracts and because the Coachella Valley is a small region, local and small business power procurement opportunities are very limited. As noted, one of the goals of DCE is to keep profits in our local communities to benefit businesses and residents, including those who have suffered from economic marginalization.

The California Public Utilities Commission (CPUC) General Order 156 (GO 156) emphasizes preferential purchasing for Women Minority Disabled Veteran Lesbian Gay Bisexual Transgender Business Enterprises (WMDVLGBTBE). In compliance with Proposition 209, CCAs as local government entities do not explicitly give preferential treatment to bidders based on race, sex, color, ethnicity, or national origin. To comply with Proposition 209, CCAs may collect this information only after contracts are signed, and responses are kept separate from procurement decision makers, so that this information does not influence any current or future solicitation or selection process. Proposition 209 limits CCAs as public agencies from engaging in several of the activities associated with supplier diversity under GO 156. However, DCE recognizes there is more to do to support small, local, and diverse businesses within our region. Consistent with the requirements of Senate Bill 255, this report describes DCE's continued efforts to plan for and implement practices to increase procurement from small, local, and diverse businesses, as well as report to the Commission on its procurement from these sources.

9.1.1 Diverse Program Activities

In 2021, DCE engaged in the following activities oriented toward increasing supplier diversity:

- 1. Crafting this Annual Supplier Diversity Report and Plan.
- 2. Continued familiarizing staff with the history, requirements, and intent of Senate Bill 255 and General Order 156.
- 3. Continued working with other CCAs as members of CalCCA to share best practices in how to maximize supplier diversity in our communities, given the constraints of Proposition 209.
- 4. Reviewing information provided by CPUC staff regarding compliance with GO 156 and the opportunities available to CCAs to diversify procurement.
- 5. Started working to develop an action plan to diversify our business enterprise (BE) opportunities.
- 6. Plan to increase our efforts in 2022 to expand on diversity and inclusion goals, including procurement, community relations, board representation, and hiring/contracting practices.

In 2022, DCE will dedicate resources to working with our existing and future suppliers on opportunities to expand institutional diversity and inclusion for WMDVLGBTBEs. Due to staffing changes in 2021, DCE was not able to accomplish all of our objectives for expanded supplier diversity. With the addition of new staff in early 2022, DCE is in a position to expand our efforts this year. This will include researching and reaching out to SBA 8(a) companies and organizations and assisting with getting them registered in the Supplier Clearinghouse to expand opportunities for them. The Coachella Valley is a unique, diverse region with many business owners who fall within the GO 156 parameters who may not know about the Clearinghouse or realize their eligibility for registration and inclusion.

<u>Hiring Practices</u>. Desert Community Energy staffing is provided by the Coachella Valley Association of Governments (CVAG) through a management services agreement, approved by the DCE Board. Thus, DCE does not directly employ staff. However, CVAG is an equal opportunity employer and recruiting and hiring practices are established to strive for diversity, consistent with the requirements of Proposition 209. Recruitment outreach attempts to reach diverse pool of potential job applicants.

<u>Community Advisory Committee</u>. DCE has a Community Advisory Committee (CAC) made up of representatives from the member cities. In 2021, DCE recruited to fill a vacancy in the CAC from the City of Palm Springs. Recruiting efforts focused on reaching out to individuals from diverse backgrounds, particularly someone who could represent underserved members of the community. This recruitment resulted in the appointment of a Spanish speaking representative who has already brought some

strong suggestions for outreach to help DCE reach diverse parts of the community.

2020-2021 Renewable Request for Offers. A Renewable Request for Offers was issued in May 2020 to solicit offers for renewable energy projects. In December 2020, the DCE Board approved a power purchase agreement for three wind energy projects located within the city limits of Palm Springs. With the completion of these agreements, DCE moved closer to meeting renewable energy goals and helping build new incremental renewables in California. In addition, DCE was able to partner with local developers and in so doing generate new temporary and permanent jobs within our region. Completing renewable procurement within the local community is consistent with DCE Board's direction and overall goals for local carbon free and renewable energy.

9.1.2 Summary of Purchases

DCE has a commitment to purchasing from small, local and diverse businesses to the extent possible within our region. This section summarizes the results for 2021 of DCE procurement in the requested categories. It should be noted that the majority of DCE's procurement is through wholesale power contracts. As a result, opportunities to engage with local and small businesses is more limited. Many of the electric generation resources are developed, owned and operated by large corporations with sufficient capital to manage these projects. Still, DCE has been successful in procuring wind energy from projects within the local community (please see section 9.1.1) from a local developer. DCE intends to expand efforts to increase supplier diversity efforts in the coming years.

Des	sert Comm	unity Energy	20	21 Report		G.O. #156 Sec.	9.1.
			WMDVLGBTBE An	nual Results by			
					2020		
				Direct	Sub	Total \$	%
1		Asian Pacific A	merican	\$0	\$0	\$0	0.0
2		African America	an	\$0	\$0	\$0	0.0
3	Minority	Hispanic Amer	ican	\$0	\$0	\$0	0.0
4	Male	Native America	n	\$0	\$0	\$0	0.0
5		Total Minority M	lale	\$0	\$0	\$0	0.0
6		Asian Pacific A	merican	\$0	\$0	\$0	0.0
7		African America	an	\$0	\$0	\$0	0.0
8	Minority	Hispanic Amer	ican	\$0	\$0	\$0	0.0
9	Female	Native America		\$0	\$0	\$0	0.0
10		Total Minority F	emale	\$0	\$0	\$0	0.0
11	Total M	inority Business	Enterprise (MBE)	\$0	\$0	\$0	0.0
12	Wom	ien Business Er	terorise (W/BE)	\$0	\$0	\$0	0.0
. ~ [\$ 5	ψu	Ψ0	0.0
- 1	Lesbi	ian, Gay, Bisexua	al. Transgender				
13		isiness Enterpris		\$132,304	\$0	\$132,304	0.2
-							
	[Disabled Veterar	Business				
14		Enterprise (I	OVBE)	\$0	\$0	\$0	0.0
		· ``					
15		Other 8(a	a)*	\$0	\$0	\$0	0.0
16		TOTAL WMDV	LGBTBE	\$132,304	\$0	\$132,304	0.2
				¢:0_,001	~ ~	• •• - ,•••	
17	Net Procure	ement**	\$45,410,888				
	NOTE:	FIRMS CLASSIF	IED AS 8(a) OF SM ALL BUSINI	ESS ADMINISTRATION I	NCLUDES NON-WM	IDVLGBTBE	
			MENT INCLUDES PURCHASE	DRDER, NON-PURCHASE	ORDER, AND CRE	DIT CARD DOLLARS	
		Direct - DIRECT F	ACTOR PROCUREMENT				
			OF NET PROCUREMENT				

WMDVLGBTBE Annual Results by Ethnicity

WMDVLGBTBE Direct Procurement by Product and Service Categories

DCE does not have sufficient procurement information broken down by product and service categories for our certified vendors.

Deg	sert Comn	nunity Energy		202	1 Report			GO	#156 Sec. 9.1	.2
Det			VLGBTBE Direc		-	oduct and	Service Ca			
					Product	-	Servic		Total	
					\$	%	\$	%	\$	%
1		Asian Pacific Am		Direct	\$0	0.00%	\$0 ©0	0.00%	\$0	0
2	Minority	African American		Direct	\$0 \$0	0.00%	\$0 \$0	0.00%	\$0 \$0	0
4	Male	Hispanic America		Direct Direct	\$0 \$0	0.00%	\$0 \$0	0.00%	\$0 \$0	0
5		Total Minority Mal	۵	Direct	\$0 \$0	0.00%	\$0 \$0	0.00%	\$0 \$0	0
6		Asian Pacific Am		Direct	\$0 \$0	0.00%	\$0 \$0	0.00%	\$0 \$0	0
7		African American		Direct	\$0 \$0	0.00%	\$0 \$0	0.00%	\$0	0
8	Minority	Hispanic America		Direct	\$0	0.00%	\$0	0.00%	\$0	0
9	Female	Native American		Direct	\$0	0.00%	\$0	0.00%	\$0	0
10		Total Minority Fer	nale	Direct	\$0	0.00%	\$0	0.00%	\$0	0
11	Total N	/linority Business I	Enterprise (MBE)	Direct	\$0	0.00%	\$0	0.00%	\$0	0
12	Wor	nen Business Ent	erprise (WBE)	Direct	\$0	0.00%	\$0	0.00%	\$0	0
13		Gay, Bisexual, Tra Enterprise (LG	nsgender Business BTBE)	Direct	\$0	0.00%	\$132,304	5.57%	\$132,304	0
					\$0	0.00%	\$0	0.00%	\$0	0
14	Disabled	Veteran Business	Enterprise (DVBE)	Direct						
15		Other 8(a)*	Direct	\$0	0.00%	\$0	0.00%	\$0	0
16		TOTAL WMDVL	.GBTBE	Direct	\$0	0.00%	\$132,304	5.57%	\$132,304	(
	Total Prod	uct								
17	Procurem		\$43,037,565							
	Total Servi		\$ 10,000,000							
18	Procurem		\$2,373,323							
19	Net Procu	ement**	\$45,410,888							
	Total Numb	per of								
	WMDVLGE	TBEs that								
20	Received D	irect Spend	1							
	NOTE:	* FIRM S CLASSIFIEI	OAS8(a) OF SMALL BUS	INESS ADM IN	ISTRATION INCL	UDES NON-WN	IDVLGBTBE			
		** NET PROCUREME	NT INCLUDES PURCHAS					RS		
		Direct - DIRECT PRO Sub - SUBCONTRAC	TOR PROCUREMENT							
			F NET PROCUREMENT							
							_			
			sufficient procu		informatio	n broken	down by p	product a	nd service	
	categor	ies for our c	ertified vendors	5.						

WMDVLGBTBE Subcontractor Procurement by Product and Service Categories

DCE does not have sufficient procurement information broken down by product and service categories for our certified vendors.

De	sert Com	nunity Energy	2(021 Report		G.O. #156 Sec. 9.1.2 ce Categories						
20		WMDVLGBTBE S		-	and Service							
				Produc	ts	Service	es	Total				
				\$	%	\$	%	\$				
1		Asian Pacific American	Sub	\$0	0.00%	\$0	0.00%	\$0				
2		African American	Sub	\$0	0.00%	\$0	0.00%	\$0				
3	Minority Male	Hispanic American	Sub	\$0	0.00%	\$0	0.00%	\$0				
4	wale	Native American	Sub	\$0	0.00%	\$0	0.00%	\$0				
5		Total Minority Male	Sub	\$0	0.00%	\$0	0.00%	\$0				
6		Asian Pacific American	Sub	\$0	0.00%	\$0	0.00%	\$0				
7		African American	Sub	\$0	0.00%	\$0	0.00%	\$0				
8	Minority	Hispanic American	Sub	\$0	0.00%	\$0	0.00%	\$0				
9	Female	Native American	Sub	\$0	0.00%	\$0	0.00%	\$0				
10		Total Minority Female	Sub	\$0	0.00%	\$0	0.00%	\$0				
		,				· · ·						
11	Total N	/inority Business Enterprise	(MBE) Sub	\$0	0.00%	\$0	0.00%	\$0				
			()	÷ •		+-		÷ •				
12	Wor	nen Business Enterprise (W	BE) Sub	\$0	0.00%	\$0	0.00%	\$0				
12	1101			ψU	0.0070	ψŬ	0.0070	ψU				
Ť	Lashian		Dusinana									
13	Lesbian,	bian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		\$0	0.00%	\$0	0.00%	\$0				
15			Sub									
- f		Į į										
14	Disabled	Veteran Business Enterpris	e (DVBE) Sub	\$0	0.00%	\$0	0.00%	\$0				
	Disablea											
15		Other 8(a)*	Sub	\$0	0.00%	\$0	0.00%	\$0				
10			Cub	ψυ	0.0070	ψŬ	0.0070	ψU				
16		TOTAL WMDVLGBTBE	Sub	\$0	0.00%	\$0	0.00%	\$0				
						ĺ						
	Total Prod	uct										
17	Procureme	ent	\$0									
18	Total Servi	ce Procurement	\$0									
19	Net Procur	ement**	\$0									
	NOTE	* FIRMS CLASSIFIED AS 8(a) OF										
		** NET PROCUREMENT INCLUDE					RS					
		Direct - DIRECT PROCUREMENT										
		Sub - SUBCONTRACTOR PROCU %- PERCENTAGE OF NET PROC										
	DCE do	es not have sufficie	nt procuremen	t informatio	n broken	down by p	roduct an	d service				
	categor	ies for our certified	vendors.			_						

WMDVLGBTBE Procurement by Standard Industrial Categories

DCE does not have sufficient procurement information broken down by product and service categories for our certified vendors.

Desert Community Energy							2021	Report					G. O. #15	6 Sec 9.1.2		
	WMI						urement b	y Stand	ard Indus	trial Categ	ories					
								Lesbian, Gay,		-						
												Bise xual,	Disabled			
										Minority	Women	Transgender	Veterans			
										Business	Business	Business	Business			
			ific American				-		-		Enterprise	Enterprise	Enterprise	Other 8(a)**	Total	Total
SIC Category	_	Male	Female	Male	Female	Male	Female	Male	Female	(MBE)	(WBE)	(LGBTBE)	(DVBE)		WMDVLGBTBE	
8743 Public Relations Services	\$											\$132,304			\$132,304	
	%											0.29%			0.29%	0.299
Category 2	\$ %															
	% \$															
Category 3																
Category 4	\$															
	\$															
Category 5	%															
	\$															
Category 6	%															
	\$															
Category 7	%															
	\$															
Category 8	%															
Cata	\$															
Category 9	%															
Category 10	\$															
category to	%															
TOTAL	\$															
IUIAL	%															

A40.007.505
\$43,037,565
\$2,373,323
\$45,410,888

NOTE: FIRMS WITH MULIT MINORITY OWNERSHIP STATUS

**FIRM S CLA SSIFIED AS 8(a) OF SMALL BUSINESS ADMINI STRATION INCLUDES NON-WMDVLGBTBE

***NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS

TOTAL DOLLARS - TOTAL PROCUREMENT DOLLAR AMOUNT IN THE SPECIFIC SIC CATEGORY

% - PERCENTAGE OF TOTAL DOLLARS

DCE does not have sufficient procurement information broken down by product and service categories for our certified vendors.

Number of WMDVLGBTBE Suppliers and Revenue Reported to the Clearinghouse

DCE populated the "Utility-Specific 2021 Summary" portion of this table with our vendor revenue; we did not have sufficient information to report "Revenue Reported to CHS" this year. We will strive to engage our vendors earlier in program year 2022 to obtain this information.

					ATTAC	HMENT C	1						
De	esert Commu	nity Energy			2021	Report		G. (D. #156 Sec 9.1	l.2 (D.11-05	019 & D.06-1	1-028)	
			Number of	WMDVLGBT	BE Suppliers	and Revenue F	Reported to	the Clearing	house	8	1		
	-												
	_					Data on Number	r of Supplier:						
	ļ	-	Revenue Re		1				tility-Specific		î.		
# WMDVLGBTBEs	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand T	otal
Under \$1 million									1			1	
Under \$5 million													
Under \$10 million													
Above \$10 million													
TOTAL									1			1	
						Devenue and D) au mus má Data						
			Devenue De	monto d to Cl		Revenue and P	'ayment Data		tility Croatia I	00001 0			
	MBE	WBE	Revenue Re	DVBE		Grand Total	MBE	WBE	tility-Specific	DVBE		Grand T	atal
WMDVLGBTBE \$M	MBE	WBE	LGBIBE	DVBE	Other 8(a)*	Grand Total	MBE	WBE	-	DVBE	Other 8(a)*		
Under \$1 million									\$132,304			\$ I3	2,304
Under \$5 million													
Under \$10 million Above \$10 million													
Above \$10 minion									\$ 132,304			\$ 13	2,304
TOTAL	4								φ 102,004			ψιο	2,004
NOTE			SMALL BUSINES		TION INCLUDES N	on-wmdvlgbtbe							
	: CLEARINGHOUS												

Number of WMDVLGBTBEs with Majority of Workforce Working in California

DCE does not have sufficient information to determine the number of certified diverse employees working in California; however, our certified vendors are based in California.

	ATTACH	MENT C				
Name of Utility	2021 R	eport	G.O. #156 Sec. 9.1.2			
Description of WMDVL	GBTBEs with C	A Majority Wor	kforce			

[This space is intentionally left blank; content continues on next page.]

9.1.3 Diverse Supplier Program Expenses

DCE does not have details for this section for 2021. DCE staff will work with our vendors to obtain this information earlier in the program year 2022. DCE staff also plans to work with local vendors to encourage participation in the Clearinghouse certification process.

	ATTACH	IMENT C								
Desert Community Energ	gy 2021 F	2021 Report								
	WMDVLGBTBE P	rogram Expenses)S							
E	xpense Category	Year (Actual)								
Wages		\$0								
	Employee Expenses	\$0								
Progra	m Expenses	\$0								
Report	ing Expenses	\$0								
Trainin	g	\$0								
Consu	tants	\$0								
Other		\$0								
	TOTAL	\$0								

9.1.4 Description of Progress in Meeting or Exceeding Set Goals

This section is not applicable to CCAs.

9.1.5 Summary of Prime Contractors Utilization of Diverse Supplier Subcontractors

DCE's prime contractors may have utilized diverse supplier subcontractors; however, DCE does not have these records for 2021. DCE will work with primary contractors to identify ways to enhance supplier diversity and encourage them to participate in the Clearinghouse certification process.

9.1.6 List of WMDVLGBTBE Complaints Received

DCE did not receive any formal complaints this reporting cycle.

9.1.7 Description of Efforts to Recruit WMDVLGBTBE Suppliers in Low Utilization Areas

This section is not applicable to CCAs.

9.1.8 Retention of All Documents/Data

This section is not applicable to CCAs.

9.1.11 WMDVLGBTBE Fuel Procurement

DCE did not procure electricity from a CPUC Supplier Diversity Program certified entity during reporting year 2021, nor did DCE have any owned power plants or power purchase agreements which would require us to provide fuel for generators (Table 9.1.11 on next page.)

AL		Post	2011	Fu	els f	or G	ener	atio	n				er P	urcha	ased					1	
SubTotal % of Total Procurement Spend	SubTotal of Columns ⁴	SubTotal % of Total Procurement Spend	subTotal of Columns	Direct	Natural Gas	Direct	Nuclear	Direct	Diesel		Direct Physics	×		5	Products Direct	Renewable Power			Product ¹		
%	Ś	%	s.	%	-	%	ş	%	ş	%2	Ś		s	% ²	\$°	%	s		Unit		
																		Male	Ą		1
																		Female	Asian Pacific American		
																		Total	nerican		
																		Male	Afri		
																		Female	African American	Resu	
																		Total		Results by Ethnicity & Gender	
																		Male	Hispa	ty & Gender	
																		Female	Hispanic American		
				0.														Total			
																		Male Fe	Native		
																		Female T	Native American		(All
																		Total			dollar fig
																		Total	Minority Business Enterprise (MBE)		(All dollar figures in \$MM)
																		Total	Women Business Enterprise (WBE)		IM)
																		Total	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Result	
																		Total	Disabled Veteran Business Enterprise (DVBE)	Results by WMDVLGBTBE Certification	
																		Total	Other 8(a) ⁶	ertification	
			, v															Total	Subcontracting Total		
Overall WMDVLGBTBE %:	\$ -	Overall WMDVLGBTBE %:	\$																Total WMDVLGBTBE Procurement Spend ³		
	\$ 2,440,939		\$ 1,923,440								- \$		\$ 1,992,439		\$ 1,923,440		\$ 448,500		Total Procurement Spend		

Annual Power Product Results by Ethnicity and WMDVLGBTBE Certification

Notes:

¹Excludes purchases from the CAISO, other IOUs, utilities, Federal entities, State entities, Municipalities and cooperatives

²Includes only long term power procurement commitments after June 6, 2011 or as a result of RFOs after June 6, 2011

³Total WMDVLGBTBE spend does not include pre-COD subcontracting values

Includes all power procurement commitments

⁴Includes all power procurement commitments

⁵Firms with multi-minority ownership status

 6 Firms classified as 8(a) by the Small Business Administration includes non-WMDVLGBTBE

% - percentages calculated by the Row Category Total Procurement Spend

2022 Annual Plan

10.1.1 WMDVLGBTBE Annual Short-, Mid- and Long-Term Goals by Product and Service Category

This section is not applicable to CCAs.

10.1.2 Description of WMDVLGBTBE Internal and External Activities for 2022

PLANNED EXTERNAL PROGRAM A	CTIVITIES FOR 2022
Proposed Activity	Description
Host our own version of Certify and Amplify	Using MCE's Certify and Amplify workshop as a model, continue work on developing an online Supplier Clearinghouse certification training, which can be recorded and saved to the DCE website for later viewing. The purpose of the workshop is to explain the process and benefits of certification for diverse BEs, as encouraged by CPUC General Order 156. The goal is to focus on Coachella Valley and Riverside County businesses. We intend to collaborate and leverage existing relationships with local Chambers of Commerce, business networks, and SCE to maximize the benefit of this event to our community.
Provide technical assistance to diverse BE's: Encourage local firms and existing vendors to pursue certification	Assist local diverse BEs that are interested in gaining certification to be listed on the state's Supplier Clearinghouse database. Be available to answer technical questions on certification requirements and assist with the required submission of required materials.
Participate in diverse organizations and chambers of commerce	Identify local diverse organizations and chambers of commerce that would be interested in hearing about GO 156 and the State's Supplier Clearinghouse; this may involve being a speaker at a regular meeting or providing information on the benefits of certification.
Participate in local, state, national supplier diversity events	Similar to the activity above, identify events (preferably local, but also regional and statewide) where DCE can engage with diverse supplier groups, such as the National Business Inclusion Consortium, the Western Regional Minority Supplier Development Council, and the Women's Business Enterprise Council.

PLANNED INTERNAL PROGRAM ACTIVITIES FOR 2022	
Proposed Activity	Description
Develop DCE team that sets supplier diversity goals for each department and works toward achieving established goals.	DCE is a small agency with limited staff. In 2022 we will work with our new team members to become familiar with supplier diversity requirements, setting goals (qualitative and quantitative), further developing the activities contained in these tables, and crafting strategies to achieve goals.
Track spend and regularly report results to DCE Board of Directors.	DCE will improve our ability to track spending with diverse BEs. Staff will prepare a report summarizing the annual GO156 submission and deliver this report for review by the DCE Board of Directors.
Share upcoming contracting opportunities with Supplier Clearinghouse database with a priority on local suppliers; respond to diverse BE prospective supplier inquiries	DCE team will become familiar with supplier database spreadsheet; when a purchasing or contract opportunity arises, they will reach out to local businesses with GO156 certification first, then consider other GO156 suppliers for the given purchase/contract. DCE will create a form on its website whereby contractors can enter their e-mail address to be included in upcoming contract and procurement opportunities.
Have supplier diversity training at DCE all-staff meeting	Staff will deliver a high-level presentation during an all-staff meeting to educate staff on GO156 background, CPUC requirements, DCE efforts, and the importance of supplier diversity.
Work with prime suppliers to optimize diverse participation and accurately report. Train prime suppliers in certification requirements so they can educate their subcontractors to certify.	Staff with direct relationships with prime contractors will provide information to said primes to encourage them to certify, and also educate their subcontractors to certify.

10.1.3 Plans for Recruiting WMDVLGBTBE Suppliers in Low Utilization Areas

This section is not applicable to CCAs.

10.1.4 Plans for Recruiting WMDVLGBTBE Suppliers Where Unavailable

This section is not applicable to CCAs.

10.1.5 Plans for Encouraging Prime Contractors to Subcontract WMDVLGBTBE Suppliers

This section is not applicable to CCAs.

10.1.6 Plans for Complying with WMDVLGBTBE Program Guidelines

This section is not applicable to CCAs.

CONCLUSION

As a newer CCA, Desert Community Energy is working towards a more comprehensive effort to promote supplier diversity. DCE recognizes that this program is still in the early stages of development; more work needs to be done to align DCE procedures and processes to meet supplier diversity goals. DCE will continue to collaborate with other CCAs and CalCCA to identify program best practices and opportunities for information sharing. Desert Community Energy appreciates the assistance that has been provided by CPUC staff and looks forward to working together to enhance supplier diversity programs in the coming years.