

March 1, 2024 – UPDATE 3/8/24

VIA ELECTRONIC FILING

Ms. Rachel Peterson
Executive Director, Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3288

Re: Frontier's General Order 156 Compliance Filing – 2023 Annual Report and Annual Plan

Dear Ms. Peterson:

Pursuant to General Order 156 ("GO 156"), Frontier California Inc. (U-1002-C), Citizens Telecommunications of California Inc. (U-1024-C) and Frontier Communications of the Southwest Inc. (U-1026-C), (collectively "Frontier") hereby electronically files its 2023 Annual Report and Annual Plan in compliance with GO 156, Sections 9 and 10. This report is available to others upon request.

Please contact me with any questions at jenny.smith@ftr.com or Dawn Gilbert at dawn.gilbert@ftr.com.

Sincerely,

Jenny Smith
Director, Government and External Affairs

cc: Stephanie.Green@cpuc.ca.gov
Dawn Gilbert, Director of Strategic Sourcing Frontier

2023 ANNUAL REPORT AND ANNUAL PLAN

**WOMEN, MINORITY, DISABLED VETERAN, AND
LGBT OWNED BUSINESS ENTERPRISES**

**California Public Utilities Commission
1 March 2024**



2023 ANNUAL REPORT AND ANNUAL PLAN

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INTRODUCTION

Frontier California Inc. (U-1002-C), Citizens Telecommunications of California Inc. (U-1024-C) and Frontier Communications of the Southwest Inc. (U-1026-C), (collectively “Frontier”) submits this consolidated 2021 Annual Report and Annual Plan in compliance with General Order 156 (“GO 156”) of the California Public Utilities Commission (“CPUC”).

This report documents Frontier’s supplier diversity activities and results for 2022, the eighth-reporting year since Frontier assumed operation of the landline operations of Verizon California Inc. (U-1002-C) as approved in D.15-12-005. As Frontier enters its ninth year of reporting, our commitment to growing an effective and sustainable strategy in WMDVLGBTQE’s spend has been in the forefront of our evolution. We are developing our regional program to a national commitment to Supplier Diversity which started at the top of our organization. To support those efforts, we have established region Supplier Diversity Champions to support the needs of the supplier community. In 2023, Frontier regained a path of growth in our Supplier Diversity program by focusing on our Prime Supplier spend.

In an effort not to lose momentum we have gained within the Supplier Diversity program we have verified that changes in procurement spend do not disproportionately impact diverse suppliers, organizations implementing the following measures:

1. Regular Monitoring and Analysis:
 - Regularly monitor procurement spend data.
 - Analyze spending patterns to identify any disproportionate impact on diverse suppliers.
2. Supplier Scorecards:
 - Develop supplier scorecards that include diversity metrics.
 - Evaluate supplier performance based on diversity goals and monitor changes over time.
3. Transparency and Reporting:
 - Maintain transparency in procurement processes.
 - Regularly report on diversity metrics and their impact on spending decisions.
4. Diversity Audits:
 - Conduct periodic diversity audits to assess the effectiveness of diversity initiatives.
 - Ensure that diverse suppliers have equal opportunities in the procurement process.
5. Supplier Outreach and Support:
 - Provide ongoing support and resources to diverse suppliers.
 - Implement programs to help diverse suppliers navigate challenges and succeed.
6. Stakeholder Engagement:
 - Engage with stakeholders, including diverse suppliers and advocacy groups.
 - Solicit feedback and address concerns to ensure fair treatment.
7. Training and Awareness:
 - Provide training to procurement teams on the importance of diversity.
 - Raise awareness about potential biases and ensure fair evaluation processes.

8. Continuous Improvement:

- Continuously assess and refine diversity strategies based on feedback and outcomes.
- Adjust procurement processes to address any identified disparities.

9. Benchmarking:

- Benchmark the organization's diversity performance against industry standards.
- Identify areas for improvement by comparing with best practices in supplier diversity.

By combining these measures, we have established a robust system to verify and address any disproportionate impact on diverse suppliers resulting from changes in the Frontier procurement spend.

Infrastructure is key to on- going success of Frontier’s Supplier Diversity initiatives. With consistent progress to achieve the GO 156 goals as well as supplier diversity commitments made in the acquisition, we continue to experience growth in our 2nd tier spend with WMDVLGBTE’s suppliers throughout the supply chain.

In 2023, Frontier maintained its focus on diversity by building stronger bonds with some of the non-traditional CBOs in the Supplier Diversity community. Some of the activities associated to Frontier’s newly engaged DEI focus are reflected below:

2023 DEI Accomplishments

Year in Review



- Won RippleMatch 2024 Award for Top 50 Small Early Career Programs. Doubled percent of 18-24 hires.
- Hosted 37 interns, with 73% identifying as BIPOC and 41% identifying as women. Achieved 95% Intern NPS.
- Attended 20+ UR outreach events reaching 1,500+ students and resulting in 10,000+ social impressions.
- Launched external Early Career Site, tagging appropriate open roles as 'Early Career' eligible.



- Won 3 Military Veteran Awards, including the Military Friendly designation, Military Times Best for Vets Award, and Military.com Top 25 employers for Veterans.
- Established recruiting partnerships with 7 organizations and launched GIGAVET EIG.
- Increased veteran interviews by 13% YOY.



- Launched 7 EIGs, hosting over 800 attendees across 4 launch events and engaging 567 new members.
- Hosted 6 heritage month events, averaging 785 attendees with 90% rating events a 7 or above.
- Partnered on BB4G Week, providing free fiber and STEM donations to over 180 community members.
- Launched external DEI Career site, enhancing talent attraction efforts for underrepresented talent.



- Launched the first corporate DEI compliance training, achieving a 99% course completion rate.
- Trained 1,472 corporate employees on inclusive Mid-Year check-ins and 800 on DEIB objectives.
- Enhanced accountability for DEI by adding Community Inclusion as a performance review question.
- Performed an Equity Audit, analyzing internal data and external benchmarks to develop recommendations.

This report describes Frontier’s specific procurement practices, internal program activities, and significant partnerships with external organizations that are driving Frontier’s continued improvement in achieving GO 156 goals. Frontier’s total 2023 spend with minority business enterprises (“MBE”) and women business enterprises (“WBE”) continues to well exceed the GO 156 goals. Frontier has developed targeted initiatives designed to increase procurement opportunities for disabled veteran business enterprises (“DVBE”) and lesbian, gay, bisexual and transgender (“LGBT”) business enterprises, Small Business (SBE) with collaborations targeted at developing relationship for future initiatives.

Frontier actively works to support procurement opportunities for WMDVLGBTBEs to increase their capacity and grow our supplier diversity program. We know that supplier diversity is a journey not a destination and every year has its very own challenges.

At Frontier, we realize that supplier diversity requires a focused commitment for continued improvement and Frontier is committed to providing access, growth, and development opportunities for WMDVLGBTBE’s. Annually, Frontier forecasts opportunities for WMDVLGBTBE’s but many times those evolve and change direction throughout the year based on the needs of the business. With the offshoot of the pandemic many companies have been acquired, gone out of business, or grown at a faster pace than they could manage, thus reducing 2nd tier suppliers in many cases. At Frontier, we strive to support the supplier community and reflect the community we serve through our outreach and throughout our supply chain interactions.

Frontier is committed to continuous improvement in its supplier diversity program including significant initiatives for 2023 described in this report, aimed at achieving results to meet or exceed GO 156 goals in all categories.

Frontier discusses each topic required in this report in Sections 9.1.1 through 9.1.11.

9.0 2023 ANNUAL REPORT

Frontier Communications	2023	G.O. #156 Sec. 9.1.1
Description of WMDVLGBTBE Program Activities During the Previous Calendar Year		

Frontier is committed to increasing year over year spend with diverse suppliers. In 2023, Frontier continued to focus on total spend improvement to meet its women, minority, disabled, veteran, lesbian, gay, bisexual and transgender and small business enterprise (“WMDVLGBTBE”) goals. Frontier continues to take a holistic approach to Supplier Diversity offering suppliers on-sight, mentoring, follow ups and guidance in

approach. Including diverse suppliers in our sourcing process allows us to provide unsurpassed value to our customers by helping increase the number and types of quality products and services Frontier offers. In 2023, We completed training and utilize , we a technology partner Teal book to support development of metrics to facilitate the growth and understanding of our diverse supply chain.

INTERNAL PROGRAM ACTIVITIES

Below are some of 2023:

- Engaged Teal book as a Technology partner to build our supply base of diverse suppliers to obtain insight in areas of strength, weakness and economic development opportunity throughout the supply chain.
- Frontier continued its commitment to supplier diversity by communicating the importance of including diverse suppliers in the sourcing process to California employees with operations and purchasing responsibilities. Frontier's senior leadership issued communications outlining the importance of and our commitment to supplier diversity.
- Frontier's strategic sourcing team continues to renegotiate grandfathered service agreements to provide additional access for California WMDVLGBTBE's. while we prepare for a supplier optimization in 2024-2025
- The Frontier sourcing team performs quarterly reviews encompassing detailed evaluation of spend to identify goods and services to ensure that we are focused on areas where we can make the most impact within our Supply Chain.
- Frontier continues to review group and individual diverse spending goals to drive focused utilization of diverse suppliers.
- In 2023, We hosted our Annual Supplier Session with over 65 Supplier in attendance Virtually reviewing opportunities associated to Q4 and 2024 upcoming initiative.
- Frontier reviewed detailed spend analytics that categorize vendors, spend, and allows users to identify top areas of opportunity. We have built out a robust calendar of sourcing opportunities that is reviewed monthly by Strategic Sourcing category leaders to ensure diverse suppliers are included in spend opportunities.

EXTERNAL PROGRAM ACTIVITIES

- Frontier continues to encourage its prime suppliers to include WMDVLGBTBE's in their subcontracting activities and report on their results. We encouraged our vendors to report Tier 2 spend on a quarterly basis. The implementation of technology has dramatically increased our visibility and control over the program.

- In 2023 Frontier was a member of the Advisory Council for the following organizations:
 - American Indian Chamber of Commerce
 - Veterans in Business
 - The Asian Business Association
- In 2023, again recognized as a foundation supporter of the Veterans in Business Network, Frontier also provided in-kind support via their mentoring program for the VIB's Veteran 2 Veteran capacity building program and in 2023 supported the BRAVO mentorship program as one of 5 California utilities to guide mentee's over the 6 month program.

The B.R.A.V.O. (Business Readiness And Veteran Optimization) Mentor Protege Program is a business development program specifically designed for veteran-owned businesses • Is a national, 6-month program designed to give veteran- owned businesses an opportunity to be mentored - with up close, no holds barred access, by esteemed corporate partners and other successful veteran business owners from across the country to build relationships and the know-how crucial in today's competitive business and procurement environment • Businesses will be nurtured at various stages of development, establishing and cultivating mentor/mentee business relationships that will be mutually beneficial for all participants.

- In 2023, Frontier once again collaborated with Council for Supplier Diversity, California American Water, So Cal Gas and Golden State Water to Sponsor the High-Performance Supplier workshops. Each virtual workshop is primarily facilitated by a University of California, San Diego (UCSD) In these highly interactive workshops, suppliers heard from leading thinkers in organizational strategy, marketing, resource management, financial strategy, and business leadership. Participants had extensive opportunity to apply the learning to their companies and to receive feedback from facilitators and like-minded leaders.
- In 2023 we completed the overhaul of our Supplier Diversity contract language and include in all sourcing RFP's stating our commitment building diverse supplier 2nd tier engagement.

The following are some of the Frontier sponsored or participated in across the state in 2023.

- CPUC/ Joint Utilities Small Business EXPO.
- Supported the Asian Business Association International Women’s luncheon.
- Participated in the CPUC Fall Expo
- Sponsored the Council for Supplier Diversity High Impact Supplier Cohort
- Joint Utilities and All Community Based Public Comment Meeting.
- CPUC Annual En Banc public hearings
- Supported and Volunteered for the National VIB Conference
- Supported as mentor for the VIB Veteran 2 Veteran Cohort

9.1.2 WMDVLGBTBE Annual Results by Ethnicity

Supplier Diversity Annual Report and Annual Plan						Page 2
Frontier Communications		Report Year: 2023		GO 156 Section 9.1.2		
Supplier Diversity Results by Ethnicity						
2023 of Report						
			Direct Spend ¹ \$	Sub Spend ² \$	Total \$	%
1	Minority Male	African American	\$ 112,820.00	\$ 168,162.00	\$ 280,982.00	0.07
2		Asian Pacific American	\$ 18,286,166.00	\$ 1,887,474.00	\$ 20,173,640.00	5.14
3		Hispanic American	\$ 35,488,851.00	\$ 3,847,722.00	\$ 39,336,573.00	10.02
4		Native American	0	0	0	0
5		Total Minority Male		\$ 53,887,837.00	\$ 5,903,358.00	\$ 59,791,195.00
6	Minority Female	African American	0	0	0	0
7		Asian Pacific American	0	\$ 3,774,639.00	\$ 3,774,639.00	0.96
8		Hispanic American	\$ 1,964,650.00	\$ 443,023.00	\$ 2,407,673.00	0.61
9		Native American	0	0	0	0
10	Total Minority Female		1,964,650.00	\$ 4,217,662.00	6,182,312.00	1.57
11	Total Minority Business Enterprise (MBE)		\$ 55,852,487.00	\$10,121,020.00	\$ 65,973,507.00	16.8
12	Women Business Enterprise (WBE)		\$ 49,599,019.00	\$ 244,819.00	\$ 49,843,838.00	12.7
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		0	\$ 54,960.00	\$ 54,960.00	0
14	Disabled Veteran Business Enterprise (DVBE)		\$ 2,493,949.00	\$ 2,989,168.00	\$ 5,483,117.00	1.39
15	Persons with Disabilities Business Enterprise (PDBE)		0	\$ 43,962.00	\$ 43,962.00	0
16	8(a)*		0	\$ 382,668.00	\$ 382,668.00	0.09
17	Total Supplier Diversity Spend		\$ 107,945,455.00	\$13,836,597.00	\$121,782,052.00	31
18	Net Procurement**		\$ 392,266,258.00			

Supplier Diversity Annual Report and Annual Plan

Frontier Communications		Report Year: 2023				GO 156 Section 9.1.2				
Supplier Diversity Direct Procurement Results by Product and Service Categories										
					2023 of Report					
					Product		Service		Total	
					\$	%	\$	%	\$	%
1	Minority Male	African American	Direct	0		\$ 112,820.00	0.28	\$ 112,820.00	0.28	
2		Asian Pacific American	Direct	\$ 14,502,246.00	3.70	\$ 3,783,920.00	0.96	\$ 18,286,166.00	4.66	
3		Hispanic American	Direct	0		\$ 35,488,851.00	9.05	\$ 35,488,851.00	9.05	
4		Native American	Direct	0		0		0		
5		Total Minority Male	Direct	\$ 14,502,246.00	3.70	\$ 39,385,591.00	10.04	\$ 53,887,837.00	13.73	
6	Minority Female	African American	Direct	0		0		0		
7		Asian Pacific American	Direct	0		0		0		
8		Hispanic American	Direct	\$ 191,517.00	0.05	\$ 1,773,133.00	0.45	\$ 1,964,650.00	0.50	
9		Native American	Direct	0		0		0		
10		Total Minority Female	Direct	\$ 191,517.00	0.05	\$ 1,773,133.00	0.45	\$ 1,964,650.00	0.50	
11	Total Minority Business Enterprise (MBE)		Direct	\$ 14,693,763.00	3.75	\$ 41,158,724.00	10.49	\$ 55,852,487.00	14.24	
12	Women Business Enterprise (WBE)		Direct	0	0	\$ 49,599,019.00	12.64	\$ 49,599,019.00	12.64	
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		Direct	0		0		0		
14	Disabled Veteran Business Enterprise (DVBE)		Direct	0		\$ 2,493,949.00	0.63	\$ 2,493,949.00	0.63	
15	Persons with Disabilities Business Enterprise (DBE)		Direct	0		0		0		
16	8(a)*		Direct	0		0		0		
17	Total Supplier Diversity Spend			Direct	\$ 14,693,763.00	3.75	\$ 93,251,692.00	23.750	\$ 107,945,455.00	27.51
18	Net Procurement**			\$		392,266,258.00				
19	Net Product Procurement			\$		160,820,113.00				
20	Net Service Procurement			\$		231,446,145.00				
21	Total Number of Diverse Suppliers that Received Direct Spend					23				

Supplier Diversity Annual Report and Annual Plan

Frontier Communicatons		Report Year: 2023				GO 156 Section 9.1.2			
Supplier Diversity Subcontractor Procurement Results by Product and Service Categories									
		2023 of Report							
		Product		Service		Total			
		\$	%	\$	%	\$	%	\$	%
1	Minority Male	African American	Sub	\$ -		\$ 168,162.00	0.04	\$ 168,162.00	0.04
2		Asian Pacific American	Sub	\$ -		\$ 1,887,474.00	0.48	\$ 1,887,474.00	0.48
3		Hispanic American	Sub	\$ 3,847,722.00	0.98	\$ -		\$ 3,847,722.00	0.98
4		Native American	Sub	\$ -		\$ -		\$ 0	
5		Total Minority Male	Sub	\$ 3,847,722.00	0.98	\$ 2,055,636.00	0.52	\$ 5,903,358.00	1.5
6	Minority Female	African American	Sub	\$ -		\$ -		\$ -	
7		Asian Pacific American	Sub	\$ 3,774,639.00	0.96	\$ -		\$ 3,774,639.00	0.96
8		Hispanic American	Sub	\$ -		\$ 443,023.00	0.11	\$ 443,023.00	0.11
9		Native American	Sub	\$ -		\$ -		\$ 0	
10		Total Minority Female	Sub	\$ 3,774,639.00	0.96	\$ 443,023.00	0.11	\$ 4,217,662.00	1.07
11	Total Minority Business Enterprise (MBE)		Sub	\$ 7,622,361.00	1.94	\$ 2,498,659.00	0.63	\$ 10,121,020.00	2.57
12	Women Business Enterprise (WBE)		Sub	\$ 233,343.00	0.05	\$ 11,476.00	0.01	\$ 244,819.00	0.06
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		Sub	\$ 0		\$ 54,960.00		\$ 54,960.00	0.01
14	Disabled Veteran Business Enterprise (DVBE)		Sub	\$ 111,824.00	0.02	\$ 2,877,344.00	0.74	\$ 2,989,168.00	0.76
15	Persons with Disabilities Business Enterprise (DBE)		Sub	\$ 0		\$ 43,962.00	0.01	\$ 43,962.00	0.01
16	8(a)*		Sub	\$ 83,874.00	0.02	\$ 382,668.00	0.09	\$ 382,668.00	0.09
17	Total Supplier Diversity Spend		Sub	\$ 8,051,402.00	2.03	\$ 5,869,069.00	1.48	\$ 13,836,597.00	3.5
18	Net Procurement**		\$			392,266,258.00			
19	Net Product Procurement		\$			160,820,113.00			
20	Net Service Procurement		\$			231,446,145.00			

Supplier Diversity Annual Report and Annual Plan

Frontier Communications		Report Year: 2023										GO 156 Section 9.1.2				
Supplier Diversity Results by Standard Industrial Classification (SIC) Codes																
SIC Code	African American		Asian Pacific American		Hispanic American		Native American		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veteran Business Enterprise (DVBE)	Persons with Disabilities Business Enterprise (DBE)	8(a)*	Total Supplier Diversity Spend	Total Procurement
	Male	Female	Male	Female	Male	Female	Male	Female								
1531	\$ 0	0	\$ 11,767,987.00	3.00	0	0	\$ 1,773,133.00	0.45	0	0	0	0	0	0	\$ 16,275,379.00	\$ 45,006,662.00
	%	0													3.45%	
1611	\$ 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$ 22,399,393.00
	%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
1711	\$ 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$ 16,333.00
	%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1799	\$ 0	0	\$ 3,783,920.00	0.96	0	0	0	0	0	0	0	0	0	0	\$ 3,783,920.00	\$ 14,447,642.00
	%	0													0.96%	
4899	\$ 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$ 999,911.00
	%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3025	\$ 112,820.00	0.28	0	0	0	0	\$ 191,517.00	0.05	0	0	0	0	0	0	\$ 304,337.00	\$ 657,733.00
	%														0.33%	
7513	\$ 0	0	0	0	\$ 35,488,851.00	9.05	0	0	0	0	0	0	0	0	\$ 35,488,851.00	\$ 117,033,554.00
	%	0	0	0											9.5%	
5065	\$ 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$ 635,737.00
	%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7585	\$ 0	0	0	0	0	0	0	0	\$ 49,599,019.00	12.64	0	0	0	0	\$ 49,599,019.00	\$ 166,531,000.00
	%	0	0	0	0	0	0	0							12.64%	
8711	\$ 0	0	0	0	0	0	0	0	0	0	\$ 2,493,949.00	0.63	0	0	\$ 2,493,949.00	\$ 24,538,320.00
	%	0	0	0	0	0	0	0	0	0					0.63%	
Total	\$ 112,820.00	0.28	\$ 15,551,907.00	3.96	\$ 35,488,851.00	9.05	\$ 1,964,650.00	0.50	\$ 49,599,019.00	12.64	\$ 2,493,949.00	0.63	0	\$ 107,945,455.00	\$ 392,266,258.00	100%
	%															
Net Procurement**	\$ 392,266,258.00															

Frontier Communications

Supplier Diversity Annual Report and Annual Plan

Number of Diverse Suppliers Data														
Number of Diverse Suppliers	Revenue Reported to the Supplier Clearinghouse							Utility-Specific 2023 Summary						
	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veteran Business Enterprise (DVBE)	Persons with Disabilities Business Enterprise (DBE)	8(a)*	Total	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veteran Business Enterprise (DVBE)	Persons with Disabilities Business Enterprise (DBE)	8(a)*	Total
Under \$1 million	2	0	0	3	0	0	2	1	1	0	0	0	0	0
Under \$5 million	4	0	0	0	0	0	6	3	4	0	4	0	0	0
Under \$10 million	1	5	0	2	0	0	8	4	4	0	0	0	0	0
Above \$10 million	18	0	0	0	0	0	18	2	0	0	0	0	0	0
Total	25	5	0	5	0	0	24	10	9	0	4	0	0	23

Revenue and Payment Data														
Revenue of Diverse Suppliers	Revenue Reported to the Supplier Clearinghouse							Utility-Specific 2023 Summary						
	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veteran Business Enterprise (DVBE)	Persons with Disabilities Business Enterprise (DBE)	8(a)*	Total	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veteran Business Enterprise (DVBE)	Persons with Disabilities Business Enterprise (DBE)	8(a)*	Total
Under \$1 million	\$ 8,844,332.00	\$ 201,388,427.00	\$ -	\$ -	\$ -	\$ -	\$ 210,232,759.00	\$ 112,820.00	\$ 1,946,654.00	\$ -	\$ -	\$ -	\$ -	\$ 2,059,474.00
Under \$5 million	\$ 23,421,900.00	\$ 1,448,432.00	\$ -	\$ 7,644,997.00	\$ -	\$ -	\$ 32,515,329.00	\$ -	\$ -	\$ -	\$ 546,732.00	\$ -	\$ -	\$ 546,732.00
Under \$10 million	\$ 185,292,431.00	\$ 98,500,437.00	\$ -	\$ -	\$ -	\$ -	\$ 283,792,868.00	\$ 20,363,636.00	\$ 4,457,776.00	\$ -	\$ 1,947,217.00	\$ -	\$ -	\$ 26,768,629.00
Above \$10 million	\$ 246,003,330.00	\$ 65,060,043.00	\$ -	\$ 88,754,399.00	\$ -	\$ -	\$ 399,817,772.00	\$ 35,376,031.00	\$ 43,134,549.00	\$ -	\$ -	\$ -	\$ -	\$ 78,510,580.00
Total	\$ 476,561,893.00	\$ 366,397,339.00	\$ -	\$ 96,399,396.00	\$ -	\$ -	\$ 930,358,628.00	\$ 55,852,487.00	\$ 49,599,019.00	\$ -	\$ 2,493,949.00	\$ -	\$ -	\$ 107,945,455.00

Frontier Communications

Frontier Communications	2023	G.O. #156 Sec. 9.1.2
Description of WMDVLGBTBEs with CA Majority Workforce		

This information is not readily accessible and is not tracked by Frontier.

Frontier Communications

The following is a summary of Frontier’s WMDVLGBTBE program expenses incurred in 2023.

				ATTACHMENT C				Page 8																					
Frontier Communicaions				2023 of Report				G.O. #156 Sec. 9.1.3																					
WMDVLGBTBE Program Expenses																													
<table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="width: 50%;">Expense Category</th> <th style="width: 50%;">Year 2023</th> </tr> </thead> <tbody> <tr> <td>Wages</td> <td style="text-align: right;">\$250,000</td> </tr> <tr> <td>Other Employee Expenses</td> <td style="text-align: right;">\$0</td> </tr> <tr> <td>Program Expenses</td> <td style="text-align: right;">\$47,000</td> </tr> <tr> <td>Reporting Expenses</td> <td style="text-align: right;">\$89,000</td> </tr> <tr> <td>Training</td> <td style="text-align: right;">\$0</td> </tr> <tr> <td>Consultants</td> <td style="text-align: right;">\$0</td> </tr> <tr> <td>Sponsorships</td> <td style="text-align: right;">\$45,000</td> </tr> <tr> <td style="text-align: center;">TOTAL</td> <td style="text-align: right;">\$426,475</td> </tr> </tbody> </table>												Expense Category	Year 2023	Wages	\$250,000	Other Employee Expenses	\$0	Program Expenses	\$47,000	Reporting Expenses	\$89,000	Training	\$0	Consultants	\$0	Sponsorships	\$45,000	TOTAL	\$426,475
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9.1.4 A DESCRIPTION OF PROGRESS IN MEETING OR EXCEEDING SET GOALS AND AN EXPLANATION OF ANY CIRCUMSTANCES THAT MAY HAVE CAUSED THE UTILITY TO FALL SHORT OF ITS GOALS

In 2023, Frontier spent 31.17% of its procurement dollars with women, minority, and disabled veteran and LGBTQ owned business enterprises. In a year, when we doubled our California spend boosting the economy in the state of California, we also more than doubled our diversity spend achieving the overall GO156 target of 21.5%. We exceeded the GO 156 diversity spend goals for women and minority owned business enterprises and acknowledge there is much more work to do in the African American, Veteran, Native supplier communities. Although our supplier based was impacted by rising cost, the impact of the delays in the global supply chain as well as inflation around the world we maintained key supplier initiatives such as the Council for Supplier Diversity capacity building program. Frontier understands that all supply chains are impacted by many factors to include but not limited to global financial, socio-economic and supply annually, but we are confident that our diversity spend will grow as we work to stabilize our MWDVLGBTE base of suppliers for 2024 and beyond.

Frontier closely monitored progress and took additional steps to meet its WMDVLGBTBEs goals through the procurement opportunities associated with construction, outside plant and materials management. Frontier's supplier diversity team led a strategic cross-functional effort to identify key focus areas. The team targeted large and small Request for Proposals ("RFP") across the various products/services that had California spend impact. Some of these products and services included fiber optic cable, inside wire, network construction, and fiber to the premises ("FTTP"). As supplier transition to a new consumer product impacted 2nd tier spend and we seek to locate additional suppliers to fulfill the void. The supplier diversity team worked directly with cross-functional teams to ensure that WMDVLGBTBE suppliers were considered for every opportunity in 2023 and as we move forward in 2024.

With success of our Diverse suppliers, we understand that there will be attrition as many of our diverse suppliers have been acquired over the last few years, we consider that our greatest success when a supplier can no longer be counted as diverse due their success. One of the primary goals of the program is to assist in the growth of diverse businesses, and this is a natural byproduct of business successes. Frontier is encouraged by the success of many businesses and remain steadfast in our commitment to provide opportunities for diverse businesses to succeed. As Diversity is key to the success of all smart businesses.

Frontier Communications		Report Year: 2023		GO 156 Section 9.1.4	
Supplier Diversity Results Compared to Set Goals					
Category		2023 Result %	2023 Goal %		
Minority Male Business Enterprise		15.24	7.5%		
Minority Female Business Enterprise		1.57	10.0%		
Minority Business Enterprise (MBE)		16.8	17.5%		
Women Business Enterprise (WBE)		12.7	5.0%		
Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		0	1.5%		
Disabled Veteran Business Enterprise (DVBE)		1.39	1.5%		
Persons with Disabilities Business Enterprise (DBE)		0	1.0%		
Total		31	26.5		
NOTE:					
% - Percentage of Net Procurement.					

9.1.5 DESCRIPTION OF PRIME CONTRACTOR UTILIZATION OF WMDVLGBTBE SUBCONTRACTORS

Frontier’s supply chain/strategic sourcing department continued to focus on second tier spend that provided a direct means to increase contracting opportunities for WMDVLGBTBEs through prime supplier engagement.

Frontier’s supply chain/strategic sourcing continues to review and renegotiated grandfathered agreements to ensure diversity clauses are included in applicable supplier agreements. We also requested that new suppliers certify WMDVLGBTBE status during initial registration via our online portal. Frontier’s supply chain/strategic sourcing department also worked with prime suppliers to ensure utilization of diverse suppliers

and to ensure they meet their utilization requirements. In addition, Frontier encouraged prime suppliers to explore areas of opportunity and expansion of WMDVLGBTBEs.

Supplier Diversity Annual Report and Annual Plan										Page 12
Frontier Communicatios					Report Year: 2023			GO 156 Section 9.1.5		
Summary of Prime Contractors Utilization of Diverse Subcontractors										
	Minority Male	Minority Female	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veteran Business Enterprise (DVBE)	Persons with Disabilities Business Enterprise (DBE)	8(a)*	Total Supplier Diversity Spend	
Direct \$	\$ 53,887,837.00	\$ 1,964,650.00	\$ 55,852,487.00	\$ 49,599,019.00	0	\$ 2,493,949.00	0	0	\$ 107,945,455.00	
Sub \$	\$ 5,903,358.00	\$ 4,217,662.00	\$ 10,121,020.00	\$ 244,819.00	\$ 54,960.00	\$ 2,989,168.00	\$ 43,963.00	\$ 382,668.00	\$ 13,836,598.00	
Total \$	\$ 59,791,195.00	\$ 6,182,312.00	\$ 65,973,507.00	\$ 49,843,838.00	\$ 54,960.00	\$ 5,483,117.00	\$ 43,963.00	\$ 382,668.00	\$ 121,782,053.00	
Direct %	13.99	0.5	14.49	12.63	0	0.63	0	0	27.5	
Sub %	1.5	1.07	2.57	0.06	0.01	0.76	0.01	0.09	3.5	
Total %	15.24	1.57	16.8	12.7	0	1.39	0	0.09	31	
Net Procurement ** \$	\$ 392,266,258.00									

9.1.6 A LIST OF WMDVLGBTBE COMPLAINTS RECEIVED DURING THE PAST YEAR, ACCOMPANIED BY A BRIEF DESCRIPTION OF THE NATURE OF EACH COMPLAINT AND ITS RESOLUTION OR CURRENT STATUS:

Frontier continued its internal appeals process as outlined in GO 156, Section 7, to accept, review and resolve complaints relating to Frontier’s supplier diversity program.

Frontier did not receive any formal complaints filed with the CPUC in connection with its Supplier Diversity program during the 2023 reporting period.

9.1.7 A DESCRIPTION OF ANY EFFORTS MADE TO RECRUIT WMDVLGBTBe SUPPLIERS OF PRODUCTS OR SERVICES IN PURCHASING CATEGORIES WHERE WMDVLGBTBE UTILIZATION HAS BEEN LOW, SUCH AS LEGAL AND FINANCIAL SERVICES, FUEL PROCUREMENT, AND AREAS THAT ARE CONSIDERED HIGHLY TECHNICAL IN NATURE.

Frontier continued to focus on areas of low utilization. To identify diverse suppliers in areas of low utilization, Frontier has:

- Searched for WMDVLGBTBE’s within the low utilization categories to make contact and develop relationships that may lead to procurement opportunities.
- Worked actively with other utilities to share ideas on how to identify and solicit new WMDVLGBTBE’s.
- Worked with WMDVLGBTBE’s that are not certified with the Clearinghouse to complete the necessary documentation to become certified.
- Collaborated with the Small Business Association to identify small minority businesses for procurement opportunities.

9.1.11 WMDVLGBTBE FUEL PROCUREMENT

Not Applicable

10.0 2025 ANNUAL PLAN

10.1.1 WMDVLGBTBE SHORT-TERM, MID-TERM AND LONG-TERM GOALS

GO 156, Section 10.1.1 requires that the annual plan include a discussion of the short-, mid- and long-term goals as required by Section 8. Frontier has provided these goals on the attached spreadsheet, with a breakdown by Standard Industrial Classification (“SIC”) Major Group, and Product category, for the utilization of WMDVLGBTBE vendors. Frontier’s goals recognize our continued commitment to provide WMDVLGBTBE’s opportunities.

Frontier Communications					2023 of Report					G.O. #156 Sec. 10.1.1					
WMDVLGBTBE Annual SHORT, MID, AND LONG-TERM Goals by Product and Service Category															
	Short-Term 2024					Mid-Term 2025					Long-Term 2026				
	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE
Products															
34. Fabric	0.00%	1.00%	0.00%	6.00%	7.00%	1.50%	0.00%	0.00%	7.00%	8.50%	2.00%	1.00%	0.00%	10.00%	13.00%
35. Indust	1.20%	0.80%	0.00%	0.00%	2.00%	2.00%	1.00%	0.00%	0.00%	3.00%	2.00%	3.00%	0.00%	0.00%	5.00%
36. Electr	4.50%	1.50%	0.00%	0.00%	6.00%	4.50%	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
38. Meas	0.00%	1.00%	0.00%	0.00%	1.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	2.00%
50. Durat	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
51. Whole	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Subtotal	5.70%	3.30%	0.00%	6.00%	16.00%	8.00%	2.50%	1.00%	7.00%	18.50%	4.00%	3.00%	2.00%	10.00%	20.00%
Services															
Category	6.00%	5.00%	0.50%	2.00%	13.50%	7.00%	5.75%	1.00%	3.00%	16.75%	8.00%	5.75%	1.50%	3.00%	18.25%
Category	5.00%	0.75%	0.00%	0.00%	5.75%	6.00%	0.00%	0.00%	0.00%	6.00%	7.00%	0.00%	0.00%	0.00%	7.00%
Category	3.00%	4.00%	0.00%	1.00%	8.25%	3.25%	4.00%	0.00%	0.00%	7.25%	2.00%	5.00%	1.00%	1.00%	9.00%
Category	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Category	7.00%	3.00%	0.00%	0.00%	10.00%	8.00%	3.00%	0.00%	0.00%	11.00%	8.50%	4.00%	0.00%	0.00%	12.50%
Category	4.00%	0.00%	0.00%	0.00%	4.00%	4.75%	0.00%	0.00%	0.00%	4.75%	2.00%	0.00%	0.00%	1.00%	3.00%
Category	0.00%	0.00%	0.75%	0.00%	0.75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Category	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.25%	0.00%	0.00%	0.25%	0.00%	0.25%	0.00%	0.00%	0.25%
Category	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Category	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Category	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Category	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Subtotal	25.00%	12.75%	1.25%	3.00%	42.00%	29.00%	13.00%	1.00%	3.00%	46.00%	29.50%	15.00%	1.50%	4.00%	50.00%

10.1.2 A DESCRIPTION OF WMDVLGBTBE PROGRAM INTERNAL AND EXTERNAL ACTIVITIES PLANNED FOR THE NEXT CALENDAR YEAR:

PLANNED WMDVLGBTBE PROGRAM ACTIVITIES FOR 2024

Frontier is committed to continuing to strengthen its supplier diversity results. Frontier's supplier diversity team will lead internal and external activities to further develop our program and increase opportunities for WMDVLGBTBEs. A summary of these activities is described below:

INTERNAL PROGRAM ACTIVITIES

- Establish National Supplier Diversity Programs effectively focusing on California, Florida, Texas, and New York, states with current regulatory commitments to WMDVLGBTBE supplier spend.
- Frontier Supplier champions established with the (4) Four Frontier regions Procurement.
- Develop and implement strategic plans to increase commitments to existing diverse suppliers and to provide opportunities for suppliers in low utilization areas based on quarterly review forecasting.
- Maintain supplier diversity's participation on cross-functional teams for RFPs and contracts to drive inclusion of diverse suppliers as subcontractors/2nd tier vendors in Frontier procurement opportunities.
- Partner and collaborate with internal business leaders to develop and implement strategies to increase diverse spend.
- Partner with sourcing and strategic prime suppliers to ensure multi-tier diversity inclusion.
- Communicate Frontier's short and long-term supplier diversity related strategic directions to key internal stakeholders.
- Regularly monitor, review, and analyze reports to track progress to ensure diversity initiatives are being executed.
- Collaborate with National and local CBOs to build greater inroads to the Minority Women owned business community with focus on construction and engineering services.
- Continue to collaborate with minority and non-minority advocacy organizations and prime contractors to support doing business with and encourage economic development of WMLGBTDVBE's.

- Continue to place high priority to encourage Frontier's prime suppliers to diversify their base of WMLGBTDVBE suppliers and subcontractors and develop relationships that will be mutually beneficial.
- Continue to work with local community-based organizations to identify suppliers as well as the Supplier Clearinghouse database and National Gay & Lesbian Chamber of Commerce to locate LGBTBE suppliers.

EXTERNAL PROGRAM ACTIVITIES

Frontier will continue to develop its supplier diversity program, with an emphasis on outreach to the supplier community, web-based tools to allow effective supplier access, and the development of best practices. Frontier will also closely monitor opportunities to increase spending results, to promote supplier diversity and to meet its objectives, including:

- Work with various chambers of commerce and business associations to conduct one-on-one meetings between WMDVLGBTBE's and Frontier's sourcing leaders to discuss both current opportunities in California and general Frontier requirements for the applicable product or service.
- Participate in local, regional, and national supplier diversity events such as: conferences, forums, symposiums, trade fairs and workshops to build awareness of Frontier's procurement requirements by participating in business matchmaking and one-on-one supplier meetings.
- Work closely with prime suppliers to ensure they meet their 2nd tier utilization requirements and review and expand areas of opportunity for diverse spend.

10.1.3 PLANS FOR RECRUITING WMDVLGBTBE VENDORS OF LOW UTILIZED AREAS:

Frontier will continue to:

- Develop and implement strategic plans to increase commitments to existing diverse suppliers and to provide opportunities for suppliers in low utilization areas.
- Work with community organizations to drive diverse participation in Frontier sourcing opportunities.
- Benchmark with other utilities to identify diverse suppliers in low utilization areas.
- Increase supplier diversity's participation on cross functional teams for RFPs for services that historically have lower levels of diverse spend including alternate sales channels, network electronics and professional services to drive inclusion of diverse suppliers for procurement opportunities.

10.1.4 PLANS FOR SEEKING AND/OR RECRUITING WMDVLGBTBE VENDORS IN ANY EXCLUDED CATEGORY AND AREAS WHERE SUPPLIERS ARE CURRENTLY UNAVAILABLE

The CPUC issued Decision 05-11-024 on November 13, 2005, in which it eliminated the use of exclusions in reporting diversity procurement results. Frontier has not used exclusions in providing this report.

10.1.5 PLANS FOR ENCOURAGING BOTH PRIME CONTRACTORS AND GRANTEES TO ENGAGE WMDVLGBTBEs IN SUBCONTRACTS IN ALL CATEGORIES WHICH PROVIDE SUBCONTRACTING OPPORTUNITIES

Frontier will continue to work closely with prime suppliers to encourage them to utilize WMDVLGBTBEs for subcontracting opportunities and review and expand areas of opportunity for diverse spend. In addition, the company's procurement department will make efforts to ensure that a diversity clause requesting suppliers to include WMDVLGBTBE sub-contractors, as appropriate, and report on resulting WMDVLGBTBE activity is part of future agreements.

10.1.6 PLANS FOR COMPLYING WITH THE WMDVLGBTBE PROGRAM GUIDELINES ESTABLISHED BY PU CODE 8283.

Frontier will continue its efforts to identify and include as many WMDVLGBTBEs as possible in its procurement activities and to follow the program guidelines established by the CPUC. Frontier's senior procurement department management will continue to actively communicate to their direct reports the need to positively influence WMDVLGBTBE activity and meet Frontier's goals. In addition, we continued our supplier diversity status updates to the docket of our bi-weekly staff meetings within the sourcing organization. This is a time for employees to share opportunities, recent successes and for our director of supplier diversity to share updates on the program.

Annual Energy Product Results by Ethnicity and WMDVLGBTBE Certification

Not applicable.

Annual Power Product Results by Ethnicity and WMDVLGBTBE Certification

Not applicable.