



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking for the Purpose of)
Reviewing and Potentially Amending General)
Order 156 and to Consider Other Measures to)
Promote Economic Efficiencies of an Expanded)
Supplier Base and to Examine the Composition of)
the Utilities' Workforce.)

R.09-07-027
(Filed July 30, 2009)

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON UTILITY SUPPLIER DIVERSITY PROGRAM STAFF REPORT ON "BARRIERS
TO ENTRY" WORKSHOP

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Dated: **July 13, 2010**

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STATE OF CALIFORNIA**

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Pursuant to the March 17, 2010 Scoping Memo of the California Public Utilities Commission (“CPUC”) in the above-referenced proceeding, the CPUC’s Utility Supplier Diversity Program Staff (“Staff”) held a workshop on June 7, 2010 focusing on the “barriers which Diverse Business Enterprises (‘DBEs’) and small businesses face when trying to compete for utility supply contracts.”¹ SCE praises the Commission and its Staff for organizing the “Barriers to Entry” workshop in order to continue the dialogue on these important issues and appreciates the opportunity to participate. On June 28, 2010, the Staff filed its report on the “Barriers to Entry” workshop (“Workshop Report”). Pursuant to the schedule set forth in the Scoping Memo, Southern California Edison Company (“SCE”) submits the following comments on the Staff’s workshop report.

I. COMMENTS ON STAFF RECOMMENDATIONS

SCE’s comments on the Staff’s recommendations are below.

A. Certification and Complaints/Insufficient DBEs

¹ Workshop Report, p. 2

In its Workshop Report, the Staff notes that steps are being taken to further improve the Clearinghouse, including launching a Social Networking portion of the website, and recommends implementation of these next phases of the website and database.² The primary purpose of the Clearinghouse is to “audit and verify the status of WMBEs, and to establish and maintain a database of WMDVBEs that is accessible to the Commission and to participating utilities.”³ In light of the expansion of and additions to the Clearinghouse, it appears that the original role and purpose of the Clearinghouse are changing. SCE would like more discussion and clarity on these changes to the Clearinghouse, including whether these changes are outside the scope of the original intent of the Clearinghouse and the funding for such changes. SCE also requests that the Staff provide greater detail on the next steps/phases of the Clearinghouse so that all parties are fully aware of the direction in which the Clearinghouse is headed.

B. Limited Bid Opportunities/Limited Industry Knowledge & Experience

SCE disagrees with the Staff’s recommendation that the utility and non-utility parties align on a specific framework for how to make planned procurement opportunities public.⁴ It should be within the discretion of the utilities to decide how and when they will make procurement opportunities publicly available. Furthermore, as SCE stated during the June 7, 2010 workshop, SCE already provides information regarding its procurement opportunities on its website. Specifically, SCE groups upcoming projects by general category and makes this information available on SCE’s website (www.sce.com/sd) at least 12 to 18 months in advance.⁵ For example, SCE includes a partial list of products and services needed by the company, which may include, solar, construction/furniture, energy efficiency, advanced technology, etc. SCE also distributes this information to DBEs and others at workshops, meetings, etc. In addition, SCE offers a “Step By Step Guide” on how to do business with SCE on its website and in a

² Workshop Report, pp. 5, 21.

³ General Order 156, Section 3.2.

⁴ Workshop Report, p. 22.

⁵ Workshop Report, p. 9.

handout, so that DBEs are prepared to take advantage of procurement opportunities with SCE when they arise.

C. Bid Feedback/Lack of Bid Sophistication

The Workshop Report states that “[c]ommunity groups agree[] that technical assistance (to become an effective bidder) and capacity building (to get larger contracts) are essential to expanding the pool of diverse suppliers and promoting successful bids,”⁶ and SCE agrees. In recognition of the importance of technical assistance and capacity building, SCE has developed the SCE Supplier University.

The SCE Supplier University (SCESU) is a new supplier development initiative that offers a wide variety of development opportunities including mentoring, workshops and experiential learning. SCESU consists of a Mentorship Program and a broader Learning Center designed to provide support to suppliers of varying development needs and across multiple-maturity levels.

- The Mentorship Program: The Mentorship Program is an 18-month program with a three tiered progressive learning curriculum aimed at suppliers poised for growth (*i.e.*, a demonstrated history of solid performance). Tier 1 offers business basics training, Tier 2 is an Executive Entrepreneur Development Program in which SCE sponsors a candidate at a university based entrepreneur development program, and Tier 3 is a Mentor Protégé Program that provides participants with coaching and support from a “Power Team” of SCE procurement, Supplier Diversity and Development and business unit representatives, as well as an executive business development coach. The Mentorship Program was launched in May 2010, and is currently in progress.
- The Learning Center: The Learning Center has four programs designed to offer a broad range of development opportunities for suppliers.

⁶ Workshop Report, p. 15

1. *Business Edge Workshops* are designed to empower new diverse business owners with broad-based, essential and practical business tools to help them build their capacity and competitive edge. These workshops are free and are offered in the evenings at three locations.
2. *Demonstration Center* activities provide “hands on” learning environments for suppliers interested in new and emerging technologies relevant to SCE.
3. *DBE Specific Programs* will address common supplier development gaps and are scheduled to launch in the fourth quarter of 2010. These programs will target high-potential candidates (three – five suppliers per category) who will be paired with a supply management team member.
4. *Targeted Capacity Building* is for the mature supplier who is ready to transition to the next level, but not quite large enough for the Mentorship Program. This program is scheduled to launch in the fourth quarter of 2010.

SCE also hosts semi-annual DBE Symposiums that bring together current and potential suppliers to provide resources, access, and tools for becoming a more successful supplier. During these one-day development events, SCE personnel, business coaches, and community representatives present topics such as improving business operations, upcoming business opportunities, how to grow your business, and how to do business with SCE. These Symposiums help SCE develop supplier-business relationships, and also promote the growth of

participating businesses through workshops and sessions designed to increase overall business knowledge and promote partnerships.

Respectfully submitted,

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July 13, 2010

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I have this day served a true copy of the Comments of Southern California Edison Company (U 338-E) on Utility Supplier Diversity Program Staff Report On "Barriers To Entry" Workshop to all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address.

First class mail will be used if electronic service cannot be effectuated.

Executed this **13th day of July, 2010**, at Rosemead, California.

/s/ Lorena Hipolito _____

Lorena Hipolito

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