

**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

**RESPONSE OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) REGARDING
ASPIRATIONAL STEPS TOWARDS GO 156 GOALS**

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May 26, 2010

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I. INTRODUCTION

Pursuant to the *Assigned Commissioner and Administrative Law Judge Scoping Memo and Ruling Determining the Scope, Schedule and Need for Hearing in this Proceeding* (“Revised Scoping Memo”) and the California Public Utilities Commission (CPUC or Commission) May 19, 2010 “Pre-Oral Argument Status Conference” requesting the filing of written responses from the GO 156 utilities, San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) hereby respectfully submit the following response addressing interim aspirational steps towards meeting GO 156 goals. SDG&E and SoCalGas expect to further expound upon these comments during the oral argument scheduled for June 23, 2010, as necessary.

II. SDG&E/SOCALGAS RESPONSE REGARDING ASPIRATIONAL STEPS

A. Identify specific steps you aspire to achieve in 2011 and 2012. Include steps toward WBE, MBE and DVBE goals and underutilized areas.

SoCalGas and SDG&E aspire to achieve goals of 9% WBE, 19.5% MBE and 1.5% DVBE in 2011 and 2012. In recent years, the two utilities have achieved supplier diversity at levels that come close to these goals, which are significantly higher than the CPUC goals of 5% WBE, 15% MBE and 1.5% DVBE. Nevertheless, SoCalGas/SDG&E aspire to maximize DBE opportunities and expect to continue taking a leadership role in the area of supplier diversity. The following discussion represents specific areas where SDG&E/SoCalGas expect to focus additional effort towards continued supplier diversity progress over the next two years.

1. Minority Women-Owned Businesses

SoCalGas/SDG&E will focus on further developing high capacity minority women entrepreneurs through technical assistance and other educational efforts. Such programs may include venues such as the Northwest University Kellogg School of Management Entrepreneurial Development, the UCLA Management for Entrepreneurial Development and other programs to assist DBEs to improve their financial and operational acumen. Further, SoCalGas/SDG&E are developing a specific mentoring program to provide expanded opportunities for the group of entrepreneurs in our utility weatherization–low income programs.

2. Service Disabled Veteran-Owned Businesses

SoCalGas/SDG&E will continue to expand the growth of high capacity DVBEs through ongoing technical assistance, one-on-one training and education programs such as the UCLA EBV (Entrepreneurship Bootcamp for Veterans with Disabilities) and other

efforts that have proven great worth and provided the DVBE's the opportunity to develop their management talent. To spur further growth of DVBEs, SoCalGas/SDG&E will continue to develop opportunities that fit DVBE capabilities.

3. Other Areas for Continuous Development

SoCalGas and SDG&E will also seek to further develop DBE suppliers and opportunities in the following areas. SoCalGas/SDG&E aspire to expand DBE participation in a number of other core areas as well. These include areas such as electrical design, construction and maintenance; natural gas pipeline system construction and maintenance. In addition, SoCalGas and SDG&E will continuously scan the marketplace for high capability DBE companies and match them to developing opportunities.

4. SoCalGas/SDG&E 2010 / 2011 Plan for Financial Services

SoCalGas/SDG&E will continue to focus on expanding DBE financial service opportunities in 2010 and 2011. SDG&E/SoCalGas have involved DBEs in a wide array of business niches, such as: investment banking, short-term cash investments, pension fund advisement, stock trading, insurance and bonding, auditing, loss reduction, and management consulting. SDG&E and SoCalGas' finance managers have also reached out to many minority-owned investment banking firms as well as community banks.

In this area, we have identified many of the most viable DBEs and will continue to work closely to mentor and develop them. One of the most important areas of focus will be expanding the role of DBEs in investment banking. SoCalGas/SDG&E plan to continue mentoring DBEs and working closely with large institutions to engage DBEs in higher value roles such as "book runner" and "co-lead". SDG&E recently achieved a

significant financial landmark when it closed a public offering of \$250 million of 30-year first mortgage bonds, utilizing a minority owned investment bank as a co-lead in the transaction. SoCalGas/SDG&E will also look to continue expanding DBEs into greater pension and benefits auditing roles. Other areas for DBE ongoing development work will be in portfolio advisement and trading roles.

5. 2010 / 2011 Plan for Legal Services

As a result of ongoing outreach and mentoring of DBE legal firms as well as a “Request for Information” sent to more than 70 DBE legal firms, SoCalGas/SDG&E have developed active roles for 17 DBE law firms across a wide assortment of legal specialties. For 2010 and beyond, SoCalGas/SDG&E will focus on further expanding DBE penetration into SDG&E legal service areas and improving on SoCalGas’ achievements as well. SoCalGas and SDG&E will continue to mentor DBEs in capital finance areas as well as expand DBEs in municipal litigation. SoCalGas/SDG&E will also sponsor professional growth activities with the California Minority Council Program and national ethnic bar associations.

6. 2010 / 2011 Plan for Consulting Services

SoCalGas and SDG&E have begun working closely with DBEs as prime contractors and project management consultants as well as encouraging prime non-DBE enterprise consulting companies to partner with DBEs on larger projects. In that regard, SDG&E/SoCalGas have held internal networking meetings with high capability DBE consultants, Company Vice Presidents and managers and Prime consulting firms.

Throughout 2010 and continuing into 2011, SoCalGas/SDG&E will hold networking meetings with finance and IT department managers identify high capacity

DBEs and help majority prime contractors to focus on the development of DBE opportunities. The opportunities that will be targeted for continued DBE growth in consulting include: IT consulting and project development; the advanced meter initiative (AMI); rate case consulting; management consulting and other areas.

In this important area, SoCalGas/SDG&E will collaborate with the Commission and other utilities to help focus majority prime consulting companies on promoting long term DBE growth and participation opportunities. Within the two utilities, SoCalGas/SDG&E will increase performance monitoring of the primes' DBE commitments.

7. 2010 / 2011 Plan for Insurance/Risk Management Services

During 2010 and 2011, SoCalGas/SDG&E will continue to mentor and expand DBE opportunities in the insurance/risk management areas. SoCalGas/SDG&E will continue to make introductions for DBE insurance service companies to primes and DBEs in order to expand the DBEs' opportunities.

As a result of the corporate crime insurance program RFP, SoCalGas/SDG&E have also identified a few qualified DBE insurance broker firms which have the experience and capabilities to potentially consult with SoCalGas/SDG&E in other areas such as quality loss control and safety consulting services. This fits with our philosophy of matching niche insurance and risk management areas to capable DBE's who have the experience and are capable of doing the work themselves, resulting in "win-win" situations for all parties.

8. 2010 / 2011 Plan for Advertising/Communications Services

SoCalGas/SDG&E will continue to expand DBEs across advertising and related services in 2010 and 2011. Management have focused on this area for a number of years, and have expanded the scope of DBE participation substantially. The advertising/communications marketing managers have developed DBE opportunities in interactive web marketing, ethnic marketing, advertising, marketing outreach, convention exhibits, printing, translation services, copyrighting, customer outreach and other areas. SoCalGas/SDG&E will sponsor meetings with high capacity DBEs, department managers and VPs and SoCalGas/SDG&E will aspire to open its general market advertising area to DBEs participation as bidding opportunities become available.

B. Is there any assistance needed to advance aspirations?

SoCalGas/SDG&E would appreciate the CPUC hosting venues for utilities, DBEs and majority prime consulting companies. The Commission could help explore the large Primes' current efforts to subcontract with DBEs as well as encourage the further development of the prime's efforts. The Commission could also host venues with all GO 156 utilities, the DBEs and the majority primes that provide services and products in core utility construction markets.

III. CONCLUSION

SDG&E and SoCalGas appreciate the opportunity to provide responses to the questions posed for discussion during the June 23, 2010 oral argument. SDG&E and SoCalGas continue to look forward to working with the Commission and interested parties in addressing the specific GO 156 related issues presented in this proceeding.

Respectfully submitted,

/s/ Carlos F. Peña

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May 26, 2010

CERTIFICATE OF SERVICE

I hereby certify that a copy of **RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) REGARDING ASPIRATIONAL STEPS TOWARDS GO 156 GOALS** has been electronically mailed to each party of record of the service list in R.09-07-027. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to the assigned Administrative Law Judges and Commissioner.

Executed this 26th day of May, 2010 at San Diego, California.

_____/s/ Jenny Norin

Jenny Norin



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