UE-210837

Utilities and Transportation Commission

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Subject: Supplier Diversity Workshop Feedback

Thank you for the opportunity to provide feedback related to Supplier Diversity for Regulated Utilities' Purchase of Resources for the Provision of Electrical Services, Docket UE-210837. I was the founder and president of General Microsystems Inc. (GMI), an information technology solution provider.

I was able to attend a portion of the virtual workshop yesterday. My responses to the questions pose the discussion portion as follows:

 Other states establish supplier diversity targets through a variety of mechanisms, including administrative rules and voluntary programs backed by MOUs. Which of these mechanisms is preferable and why?

I recommend voluntary programs backed by MOUs as an initial approach because of the flexibility to adapt based on data and experience.

2. What is the appropriate level of target setting?

Targets should be set based on factors such as the makeup of the business and community populations, gaps in achievement relative to those populations, and the contracting opportunities available. The targets should be sufficiently granular to ensure focus on the most critical gaps. The more aggregated the targets, the more likely the focus will be on the easiest targets to attain.

3. What types of contracting should these targets measure?

I recommend prioritizing based on spend impact, availability of diverse business resources, and customer need. Significant spend is often decentralized in organizations. Focusing solely on central procurement can miss important opportunities for diversity contracting in professional services and other fields.

4. Are there existing diversity certification standards utilities rely upon, and if not, how should such standards be set?

Self-certification based on standards based on organizations like the National Minority Supplier Development Council would solve a major current problem. Many businesses spend precious time and money to get certified and never receive any contracts. Self-certification with a commitment to obtain a third-party certification if business develops would solve this problem.

5. 5. How should utilities track and report on supplier diversity?

This is challenging. I hope that better tools get developed in response to the increased interest in supplier diversity.

Regards,

Earl W. Overstreet II President Emeritus