

**Exh. MAB-7  
Dockets UE-220066, UG-220067,  
UG-210918  
Witness: Molly A. Brewer**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**DOCKETS UE-220066, UG-220067,  
UG-210918 (consolidated)**

**In the Matter of the Petition of**

**PUGET SOUND ENERGY**

**For an Order Authorizing Deferred  
Accounting Treatment for Puget Sound  
Energy's Share of Costs Associated with  
the Tacoma LNG Facility**

**EXHIBIT TO TESTIMONY OF**

**MOLLY A. BREWER**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PSE Response to UTC Staff Data Request No. 62*

**July 28, 2022**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-220066 & UG-220067  
Puget Sound Energy  
2022 General Rate Case**

**DATA REQUESTS DIRECTED TO: Joshua Kensok  
REQUESTED BY: Molly Brewer**

**WUTC STAFF DATA REQUEST NO. 062:**

REQUESTED BY: Molly Brewer

**Re: Capital Planning**

Please identify every internal policy PSE has related to five-year business planning process referenced in Joshua Kensok's testimony (Exh. JAK-1T at page 3-5) by including a list of all policy numbers and titles. Please provide a copy of any document/policy/procedure that specifically identifies business planning practices that relate to ensuring that all customers are benefiting from the transition to clean energy as defined in RCW [19.405.040](#)(8) in procedure requirements. Provide in original format, preferably in Word or a text-searchable PDF. If PSE doesn't have these, please provide a detailed narrative description as to why not.

**Response:**

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 062 as overbroad and unduly burdensome to the extent it requests identification of all company policies related to the five-year planning process. PSE further objects to the interpretation of RCW 19.405.040(8) that appears to underlie the data request, which PSE views as overly broad and inconsistent with the language and intent of the statute. To the extent the data request seeks to impose or imply requirements on PSE pursuant to RCW 19.405.040(8) that go beyond the scope of Chapter 19.405 RCW, PSE objects.

More specifically, to the extent this data request interprets RCW 19.405.040(8) to apply beyond the transition to clean electricity set forth in Chapter 19.405 RCW, PSE objects to the interpretation. To the extent this data request interprets the statute to mandate that all company policies and procedures, including but not limited to PSE's five-year business planning process, expressly address how all customers will benefit from the transition to clean electricity, PSE objects to the interpretation. To the extent this data request fails to recognize the magnitude and length of the clean energy transformation set forth in the statute, and expects an immediate and wholesale revision of PSE's policies and procedures at this early date when rules have just recently been adopted, PSE objects.

Without waiving these objections and subject thereto, PSE responds as follows:

Chapter 19.405 RCW, which was passed less than three years ago, mandates a transition to 100 percent clean electricity that is to take place over a quarter-century, with interim requirements along the way. Rules to implement the statutory mandates were adopted only recently. Subsection (8) of RCW 19.405.040 requires that “in complying with” the transition to clean electricity, an “electric utility must, consistent with the requirements of RCW 19.280.030<sup>1</sup> and 19.405.140,<sup>2</sup> ensure that all customers are benefiting from the transition to clean energy.” Consistent with the statute PSE is taking action to ensure that all customers are benefiting from the transition to clean energy over the next twenty-three years, and this is reflected in PSE’s Clean Energy Action Plan, Integrated Resource Plan, Clean Energy Implementation Plan, and performance-based metrics, to name a few.

In addition, PSE developed and adopted a *Diversity, Equity & Inclusion Playbook* to present the vision for diversity, equity and inclusion (“DEI”) at PSE, including PSE’s roadmap, focus areas, leadership’s role and how PSE plans to advance its current efforts. DEI is a broader effort of PSE; it is not specific to any statutory mandate but reflects PSE’s corporate commitment to equity. Customers are among the focus areas of the *Playbook* in which PSE strives for them to have “equitable access to clean energy and experience [PSE] in a manner that reflects our values and their communities.” The purpose of the *Playbook* “is to articulate a shared vision and strategy roadmap to support our decentralized model for managing DEI” and to “help keep us aligned and moving in the same direction.” The *Playbook* is attached as Attachment A to PSE’s Response to WUTC Staff Data Request No. 062.

PSE anticipates that aspects of the Clean Energy Transformation Act will be woven into PSE’s policies and procedures, where appropriate, in the coming years.

Attached as Attachment B to PSE’s Response to WUTC Staff Data Request No. 062, please find a list of relevant processes, procedures and policies that are utilized in PSE’s five-year business planning process. However, it should be noted that PSE’s five-year planning process is a complex and dynamic year round planning process that is not succinctly captured in a list of physical policies that govern how the company makes decisions. It is the combination of explicit processes and procedures, corporate spending governance, and management judgment to achieve stated corporate objectives that often determines the decisions that lead to the final five-year plan targets and results. It would be overly burdensome and likely ineffective to attempt to boil the overall process down to policies given the level of management judgment necessary to operate a complex company like PSE on a day to day basis.

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<sup>1</sup> Addresses development of integrated resource plans and clean energy action plans.

<sup>2</sup> Requires a cumulative impact analysis to designate the communities highly impacted by fossil fuel pollution and climate change, to be completed by the department of health December 31, 2020, with rules to be adopted by December 31, 2021.



# **ATTACHMENT A to PSE's Response to WUTC Staff Data Request No. 062**



**DIVERSITY • EQUITY • INCLUSION**  
**THE DEI PLAYBOOK**



## A LETTER FROM MARY KIPP: DEI AT PSE

At the beginning of my tenure as president and CEO, I made it clear that diversity, equity and inclusion (DEI) is a priority. Personally, I believe DEI is the right thing to do. It's also a business imperative for PSE. As a utility, we have the unique obligation of providing an essential service to all of our customers. DEI must be part of the fabric of our company—how we operate, how we do business, and how we serve our customers and communities.

We have been living our values and making progress to promote DEI as this playbook was being developed. Looking back on one of the most challenging and transformational times in recent history, during which we shaped our pandemic response, PSE 2030, and our Beyond Net Zero Carbon initiative, I am proud of how we intentionally considered DEI in our business decisions. This work lays the foundation for our journey toward being a more inclusive company.

There's no end date to diversity, equity and inclusion. In a similar vein, progress does not rest on a select group of leaders or teams. It takes all of us. It has to be both external and internal, encompassing our community, our customers, our people, and our business partners.

Our DEI journey won't be quick or easy, and we will need to refine our approach as we evolve. However, I believe that with a true commitment from me, our leadership team and employees, we can make a meaningful and lasting difference.

Thank you.

A handwritten signature in black ink that reads "Mary Kipp". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Mary  
June 2021

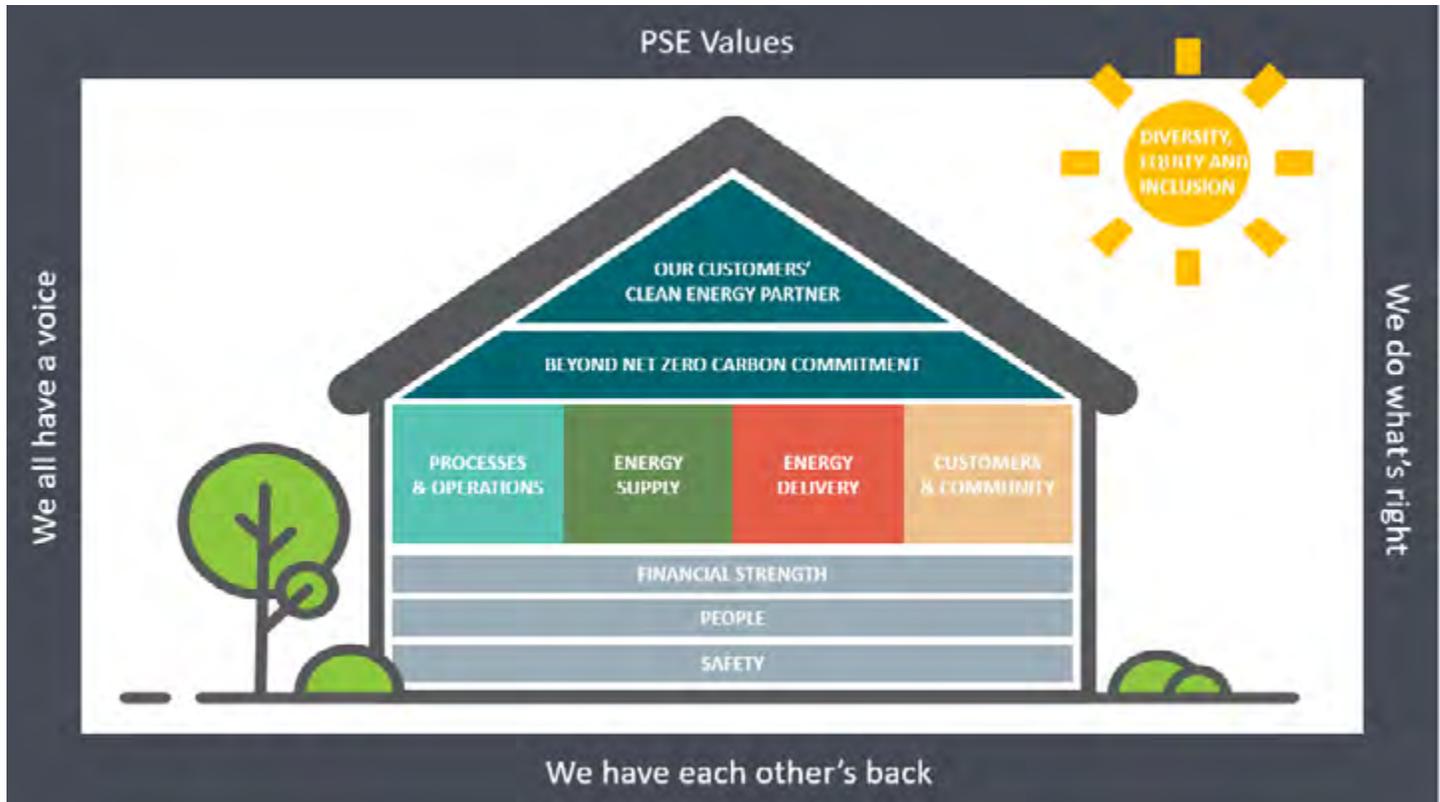
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## BACKGROUND

Puget Sound Energy is embarking on an unprecedented journey—for our employees, for our customers and for the communities that we serve.

We are guided by our north star: being our customers' clean energy partner of choice. And the challenge that we have set for ourselves—our aspirational goal—to be a Beyond Net Zero Carbon energy company by 2045.



Diversity, Equity and Inclusion (DEI) is an essential part of our journey, but DEI cannot just be internally focused. It shines on everything we do and must inform how we connect in the community, how we do business with and our expectations of third parties and suppliers, and how we serve our customers.

As such, we have four focus areas for DEI: **our community, our customers, our people and our suppliers.**

How do we make it happen? We start by mapping out our journey and defining what DEI means for our company. Is diversity a compass or an outcome? What does equity mean to us and how will it inform our decisions? Will inclusion describe our final destination?

# THE DEI PLAYBOOK

Why do we need a playbook? The purpose of the playbook is to articulate a shared vision and strategy roadmap to support our decentralized model for managing DEI. Each focus area has functional leaders in the company who are already doing great work and we have many employees who want to be involved in helping us achieve our objectives. The playbook will help keep us aligned and moving in the same direction.

## DIVERSITY, EQUITY, INCLUSION – DEFINED

Merriam-Webster defines **diversity** as the condition of having or being composed of differing elements; especially, the inclusion of different types of people (such as people of different races or cultures) in a group or organization.

We strive for diversity. We want a workforce that reflects the communities we serve. The representation of different types of people, races, cultures, etc. enriches our experiences and allows our work to be informed by many different perspectives. Workforce diversity fosters innovation, strengthens teams and produces better results. We must also recognize the diversity that exists in the communities we serve, our customers and the businesses that make up our supplier base.

The concept of equity is complex in business because it can have different meanings depending on how it's applied. In a social justice framework, **equity** is synonymous with fair, just and impartial. Our company values align with fairness, justice and impartiality and we are expected to model our values. Ensuring equitable access and outcomes for customers, the community, our people and suppliers is not a new expectation, but accountability mechanisms have matured and there is more visibility than ever before.

As an example, the equity expectations articulated in the Clean Energy Transmission Act (CETA) apply to our business. The core equity provision in CETA can be found in the intent section of the legislation (RCW 19.405.010). CETA establishes that the public interest includes the 'equitable distribution of energy benefits and reduction of burdens to vulnerable populations and highly impacted communities'. We are committed to learning and evolving in the application of equity to our business.

The desire for inclusion isn't exclusive to our people. Customers, communities and suppliers all value inclusion. Whether by being listened to, having the opportunity to influence decision making, seeking the best outcomes for customers and the community or by supporting the development of our people and our suppliers – **inclusion** is created by living our values in every aspect of our business.

Living our values – everyday – fosters a culture in which we all feel appreciated and valued for who we are and our unique contributions to our company. We all have a voice. We do what's right. We have each other's back.

## VISION OF DIVERSITY, EQUITY AND INCLUSION AT PSE

In line with our values and our north star, we must have the highest ethical standards for business growth, innovation and stakeholder return. These tie directly to our vision for diversity, equity and inclusion in our four focus areas.

- **Community:** We have strong community relationships cultivated by ongoing, meaningful engagement and dialogue.
- **Customers:** Our customers have equitable access to clean energy and experience us in a manner that reflects our values and their communities.
- **People:** Employees bring their 'whole' self to work and thrive in an inclusive culture free of any form of discrimination, including racism.
- **Suppliers:** Our commitment to supplier development has expanded economic opportunities to underutilized businesses in our region and provides PSE with access to more diverse supplier channels and sources.

## THE WHAT

Meaningful diversity, equity and inclusion outcomes are critical to the long-term success of our company. Understanding and reflecting the perspectives, needs and priorities of our community, our customers, our people and our suppliers must be an ongoing, sustained commitment – not an initiative. We will make informed decisions and set goals that are meaningful and challenging and when achieved, will demonstrate our progress toward the vision of the company.

We will take a comprehensive approach to be more inclusive and equitable in customers' experiences, community engagement, hiring and retaining employees and in our supplier relationships. We will demonstrate our commitment by building sustainable organizational capability, by embedding this work into the fabric of our company and through the ongoing engagement of our people.

## THE WHY

So why should we care about DEI? Our community, our customers, our people and our suppliers expect PSE to care about diversity, equity and inclusion. It is the right and ethical thing to do for our company and aligns with our values. Our customers expect us to cultivate a workforce representative of the communities we serve. The diversity of our people will naturally stimulate different perspectives, helping us drive innovation, business growth and exceptional results. Evaluating unintended impacts of decisions in advance helps to create more equitable outcomes for customers, stakeholders and employees. An inclusive culture where everyone feels appreciated, accepted and valued provides a competitive edge for our company.

## THE HOW

We will balance being thoughtful in setting our long-term goals and objectives with meaningful, foundational steps that include opportunities for employee engagement. We have a decentralized model for managing our efforts which means the functional owners for the four focus areas must embed this work into the ongoing, day-to-day operation of the business. Over the course of our journey, our model and approach will evolve, but for now we will start by getting started.

The objectives are informed by our business strategy, our current understanding of our areas of opportunity and our dedicated partnership with industry and regional groups committed to improving DEI outcomes in companies and our communities.

On December 1, 2020, we joined a regional coalition of employers through the [Washington Employers of Racial Equity \(WERE\)](#) pledging our support for the [Commitment to Progress](#). This coalition represents a cross-sector of companies large and small, local and global as well as regional and statewide business associations. These groups represent employers committed to the pursuit of equity for all Washingtonians by 2030.

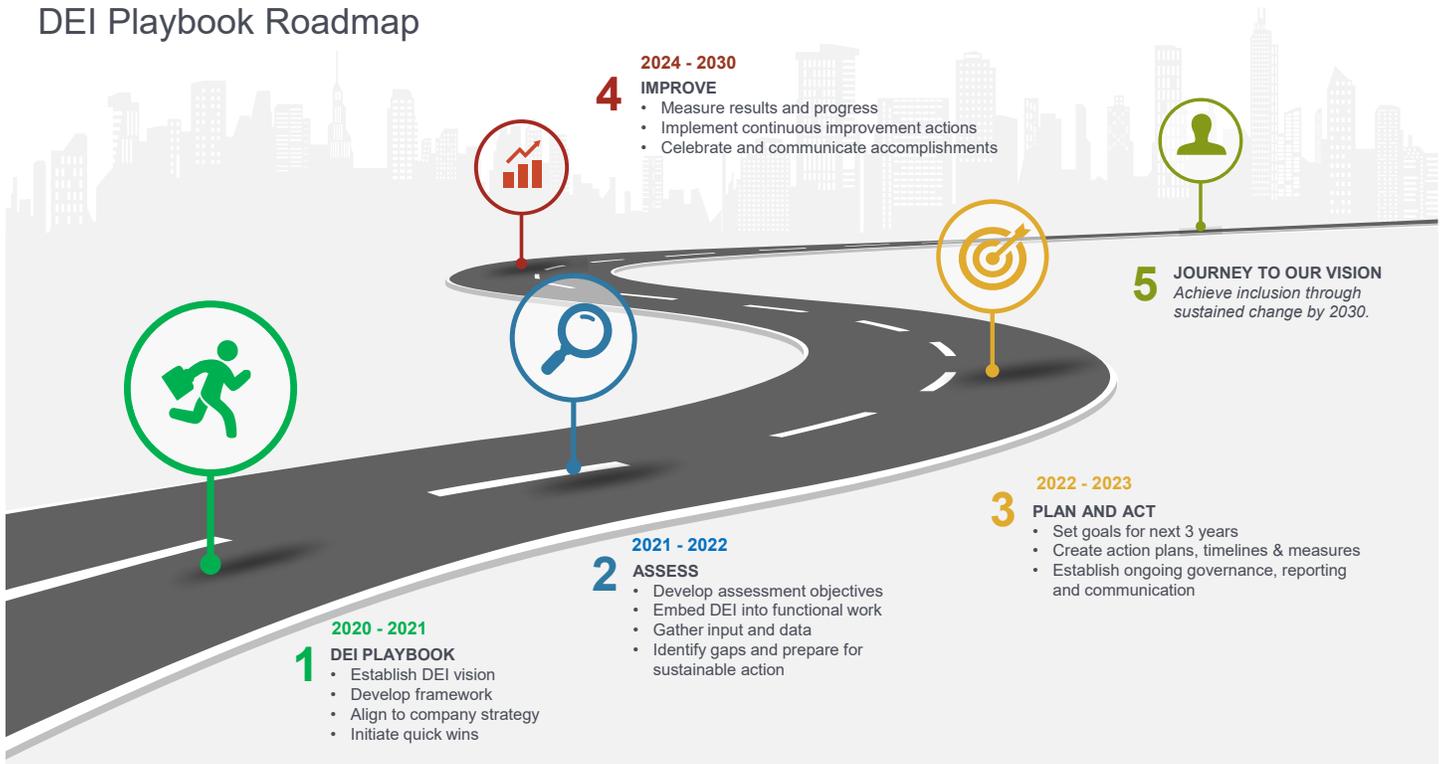
We also participate with other member companies of the [Edison Electric Institute \(EEI\)](#) to help shape DEI objectives within our industry. This partnership provides us with ongoing opportunities to learn from other companies on this same journey and benefit from shared objectives, learnings and practices.

During the first phase of our 10-year journey, we will determine our current state and establish baseline measures across the four focus areas. This will require data gathering and assessment in order to set informed, long-term goals and objectives for improvement. While it will take time, we will create opportunities to engage employees across the company in our effort to create a more inclusive culture and sense of belonging.

Our DEI Playbook provides a shared understanding of why this work is important to our company, what we are trying to accomplish and how we will approach our journey. DEI objectives will be embedded within the goals and objectives of functional areas while providing opportunities for others to be involved. Given our decentralized working model, the playbook intentionally includes a lot of information to help align our goals and objectives, key messages and approach. There are three phases in our journey to 2030 and key priorities for each.

# ROADMAP: OUR 10 YEAR JOURNEY

1) ASSESS, 2) PLAN AND ACT, 3) IMPROVE.



## ASSESS

1. Embed DEI assessment objectives into functional work for people, suppliers, customers and community
2. Gather and analyze relevant data in the four focus areas
3. Listen through focus groups, interviews or surveys to gather input from stakeholders
4. Evaluate WERE and EEI commitments and review existing DEI related efforts aligned with the commitment goals and objectives
5. Create cross-company taskforce to energize PSE Employee Resource Groups (ERGs) to enhance employee engagement opportunities.

## PLAN AND ACT

1. Utilize assessment results to determine priorities for change in DEI focus areas
2. Set goals and objectives for 3 year plan ensuring alignment with external commitments, where possible
3. Create action plans, timelines and measures
4. Implement ongoing accountability and governance structure to report accomplishments

## IMPROVE

1. Measure results
2. Evaluate effectiveness
3. Celebrate and communicate accomplishments
4. Develop and implement continuous improvement plans

# THE FOUR DEI FOCUS AREAS

What do we envision for each focus area and what will success look like when we realize our vision?

## COMMUNITY

Supporting our communities is an important part of PSE's operations and a demonstration of our values. PSE's cash and in-kind donations to community causes support our business and strengthen our relationships. We make meaningful contributions to causes that directly benefit people of color and historically underserved communities. Our brand and customer-facing messages authentically reflect the voices and experiences of the customers we serve.

## CUSTOMERS

Because our customer base grows more diverse by the minute, we're continually evaluating our products, services, brand and customer-facing messaging to ensure that we're meeting the needs of all of our customers, and delivering options that speak to them and add value to their lives. We seek to understand our customer's needs. The perspectives of historically underserved customers inform our decisions and investments.

## PEOPLE

We cultivate an environment and culture that is inclusive. Our people are valued for their unique backgrounds, points of view, expertise and experiences. Our workforce reflects the communities we serve and we live our values. We all have a voice. We do what's right. We have each other's back. Our people respect each other, leverage diverse perspectives through teamwork and recognize each other's accomplishments.

## SUPPLIERS

It's simply good business to work with diverse suppliers. Cultivating a diverse supplier base yields a diversity of perspectives, experiences and expertise that benefits us all and helps strengthen the economic infrastructure of our communities. PSE's supplier development program provides equitable access to purchasing opportunities for a diverse array of minority-owned, women-owned and small businesses. These businesses are our partners. We understand their needs and have developed mutually beneficial relationships.

# THE PLAYS FOR THE ASSESS PHASE

## OVERALL STRATEGY

- Develop mechanisms for monitoring progress, tracking accomplishments and reporting
- Develop communications plan for key milestones and achievements
- Establish ongoing touchpoints for functional owners and senior leadership

## COMMUNITY

- Review community investments to understand our historical partnerships, including which investments supported underserved communities
- Identify new opportunities to partner with community organizations that support DEI objectives
- Identify new community giving opportunities that benefit underserved communities
- Evaluate community based organizations we partner with to determine which organizations can help further DEI objectives for people and supplier focus areas
- Identify opportunities for PSE's reputational efforts and customer-facing messaging to authentically represent the voices and experience of the customers we serve
- Evaluate opportunities to incorporate DEI in annual reputation survey
- Establish community goals and measures for Plan and Act phase

## CUSTOMER

- Evaluate participation in all customer programs including demographic makeup, participation rates and spending
- Establish coordinated customer and stakeholder engagement mechanisms, including from the Equity Advisory Group, Low-income Advisory Group and other entities that provide meaningful input into PSE's planning processes to improve diversity, equity and inclusion
- With significant stakeholder input, including from its Equity Advisory Group and other resources, determine an initial set of CETA energy equity indicators for PSE
- Identify barriers to participation in planning, product development processes and program participation
- Establish customer goals and measures for Plan and Act phase

## PEOPLE

- Create DEI index in the 2021 Great Place to Work engagement survey
- Conduct the Great Place To Work engagement survey, review survey results through a DEI lens and establish baseline
- Expand unconscious bias learning opportunities across the company
- Create cross-departmental task force to energize existing employee resource groups fostering a sense of community and involvement amongst employees
- Review workforce and demographic reporting capability in Success Factors and develop plan to support DEI related data needs
- Develop training and education plan for hiring managers and interview teams to mitigate impacts of bias in hiring and selection and ensure fair and consistent treatment for candidates
- Expand development opportunities for front-line leaders with a focus on building trust to create an inclusive environment
- Establish people goals and measures for Plan and Act phase

## SUPPLIER

- Evaluate existing supplier diversity programs and initiatives
- Analyze supplier data to determine diverse suppliers already in our supply chain and our historical spend with those suppliers
- Determine data reporting capabilities and improvements needed
- Evaluate which certifications to accept as part of program, including if self-reported business will be accepted
- Partner with community outreach to determine if existing relationships can be leveraged to support supplier diversity objectives
- Engage DEI supplier community to inform our plan
- Evaluate processes to identify barriers to diverse supplier participation and develop equity improvement plan
- Establish goals and measures for Plan and Act phase

## LEADERSHIPS' ROLE IN FURTHERING DEI

Diversity, equity and inclusion starts with a tone from the top. Leadership drives corporate culture and ensures DEI is a core value. DEI is not a program, a project or initiative. It is a set of cultural norms that are instilled throughout the company and embedded into our work.

We do not decide to “do DEI” because everyone else is doing it. We decide to be more intentional and acknowledge the lack of focus in the past and the need to articulate our commitment to DEI for our future. We need to acknowledge our shortcomings, celebrate our accomplishments, and move forward to become more successful.

Leadership is the key to bring the organization along the DEI journey. Regardless of ones views on how to execute a diversity, equity and inclusion strategy, it is widely accepted that diverse workplaces that adopt equity and inclusion as core values are more successful, more innovative and more profitable.<sup>1</sup>

We will expand our capacity for a brighter future that embraces and values diverse backgrounds, demonstrates equitable treatment and creates an inclusive environment. Leaders have a critical part to play in the success of DEI at PSE.

These expectations include:

- Foster and promote a sense of belonging for employees, increased awareness of differences and the ability to understand and embrace the value of differing views and experiences
- Listen to and learn from others; especially those different from you
- Engage with team members you don't normally interact with; increase their access to you as a leader
- **Leading at the Speed of Trust;** build a culture of trust by modeling the 11 trust behaviors and using the [tools and resources](#) with your team
- Identify and mitigate bias: actively practice bias-busting techniques
- Emulate behaviors that nurture an inclusive culture
- Coach, mentor, sponsor
- Educate yourself about DEI and challenge your own thinking
- Goals – how will your team contribute to the work of DEI and how will you measure it?
- Seek help and assistance

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<sup>1</sup> See, e.g., <https://www.weforum.org/agenda/2019/04/business-case-for-diversity-in-the-workplace/> (accessed 2/10/21); <https://www.forbes.com/sites/janicegassam/2020/05/19/mckinseys-new-report-finds-that-diversity-does-not-equal-inclusion/> (accessed 2/9/21).

## WHAT'S NEXT

As we continue our journey toward our vision, we will focus our efforts on the assess phase of the 10-year DEI strategy while achieving some quick wins in the process. Each phase of the strategy has components that overlap because our progress will not be linear. Employee engagement is critical for creating an inclusive culture at PSE. We are committed to ensuring employees have opportunities to be heard and to collaborate with each other on many topics, including DEI. We encourage employees to be involved and participating in an employee resource group can be a great way to do that.

## ENERGIZING EMPLOYEE RESOURCE GROUPS (ERGS)

PSE currently has nine Employee Resource Groups. ERGs are a benefit for its members and the company as they can have a material impact on the company's ability to meet business objectives by integrating diverse perspectives, provide additional insight into how to solve problems, innovate, and meet customer needs. These groups can also help to build connections with local communities and business partners resulting in strengthened relationships.

Because of the importance of employee engagement in any DEI strategy, we will make a focused effort to energize these groups and create opportunities to consider the formation of new ERGs recognized by the company.

### CURRENT COMPANY-RECOGNIZED ERGS

- Team PSE - Charitable giving and volunteering
- Women in Leadership
- Green Team - Sustainable Practices
- Plugged In - Build professional network
- PSE2 – Patriots and Supporting Employees
- PSE Political Action Committee (PAC)
- Toast Masters - Employee development
- PSE Employee Association - Group activities & discounts (PSEEA)
- PRISM – Visible access and resource for all LGBTQIA+ employees

## ERGS DEFINED

Employee Resource Groups (ERGs) are employer-recognized workplace groups voluntarily led by employees. ERGs are formed by employees based on shared characteristics, experiences or goals and help employees within an organization build and strengthen community and share common experiences. ERGs foster a supportive environment that creates a sense of belonging for employees and enhance DEI efforts. They also give a voice to those typically under-represented in the workplace, provide support and contribute to career development, networking and mentorship.

What ERGs are	What ERGs are not
A safe place where conversations can happen freely and perspectives can be shared, openly	ERGs do not serve as an ombudsman (third party) to address employee relations matters and/or resolve employee disputes
Company-recognized and employee-led group(s), who share a common interest and who promote company engagement	Social groups related to non-business interests (e.g. sports affiliations)
A resource to provide a perspective on company strategy	A substitute for making informed business decisions

## THE VALUE OF EMPLOYEE RESOURCE GROUPS

- Creates an open forum for participants to meet and support one another in building their community and sense of belonging
- Improves alignment of organizational goals through open, transparent discussions
- Fosters a forum for innovation and creativity
- Provides a resource for leadership regarding employee and community
- Engages employees in putting our values into practice
- Increases awareness of others' perspectives/shared learnings
- Supports outreach into the community
- Supports recruitment, development and retention of employees
- Promotes employee trust, advances a respectful and inclusive culture and reinforces the importance of inclusion
- Serves to advance PSE's business objectives, mission and values

## ERG TASK FORCE

PSE has launched a task force to drive our efforts to energize our employee resource groups. Ensuring ERGs are supported and provided with a common model (e.g. group charter, sponsorship, member roles/responsibilities, etc.), where appropriate, is an important focus of the task force. The task force will help us learn from our current ERGs, identify best practices and create opportunities for groups to collaborate and learn from each other. The task force chair(s) will determine its structure, size, purpose, member selection criteria, member roles/responsibilities and deliverables.

### KEY TASK FORCE OBJECTIVES:

- Develop a standard process for making and evaluating requests for company recognition.
- Improve consistency in how these groups function
- Identify obstacles to ERG success (e.g. budget or membership)
- Ensure alignment of ERG activities with PSE business objectives
- Evaluate and measure impact
- Assist in the creation of new ERGs, as appropriate.

## APPENDIX

PLEASE REFER TO THE SEPARATE COMPANION DOCUMENT FOR THE FOLLOWING ITEMS:

- PSE Mission & Goals
- Beyond Net Zero Carbon by 2045
- PSE2030 “The Future of Utilities”
- Washington Employers for Racial Equity (WERE) commitment
- Washington Employers for Racial Equity (WERE) research report
- Edison Electric Institute (EEI) commitment
- DEI Playbook Roadmap
- Functional Owners—the Four DEI Focus Areas
- Communications—On the Journey to Inclusion

