

**NDC-SEU DATA REQUEST-006**  
**SOCALGAS- SDG&E 2019 GRC – A.17-11-007/8**  
**DATE RECEIVED: MARCH 15, 2018**  
**DATE RESPONDED: MARCH 30, 2018**

1. Provide detailed information on each annual Public Input Forum hosted by SoCalGas and SDGE. (Section I.C of the SDGE/SoCalGas/Joint Minority Party settlement in A.14-11-003). Include the dates, names of all organizations that participated, topics that were discussed, and any actions or steps taken by SoCalGas or SDGE as a result.

**Utilities Response 1:**

SoCalGas and SDG&E object to this request to the extent that it seeks information that is outside the scope of the TY 2019 GRC, seeks information that is in the public domain and is either known or equally available to NDC, and on grounds that the request is not reasonably tailored to lead to the discovery of admissible evidence. Subject to and without waiving these objections, SoCalGas and SDG&E state as follows:

SoCalGas/SDG&E & NDC jointly held their Annual Public Forum Meeting on June 28, 2017 at SoCalGas' Energy Resource Center (9240 Firestone Blvd, Downey, CA). SoCalGas and SDG&E's understanding of the details regarding the June 28, 2017, Annual Public Forum Meeting are provided below.

**Attendees**

**Sempra Utilities Reps:**

1. Regional VP, External Affairs & Environmental Strategy, SoCalGas
2. Director, Community Relations, SoCalGas
3. Manager, Supplier Diversity, SoCalGas
4. Manager, Customer Programs, SoCalGas
5. Manager, Community Relations, SoCalGas
6. Administrative Assistant, Community Relations, SoCalGas
7. Manager, Diversity & Inclusion, SoCalGas
8. Director, Community Relations, SDG&E
9. Manager, Supplier Diversity, SDG&E
10. Manager, Customer Programs, SDG&E

**NDC Reps:**

1. Faith Bautista – President & Chief Executive Officer, National Asian American Coalition (NAAC)
2. Michelle Banks, Vice President - African American Firefighter Museum
3. George Enriquez – Oasis Center International
4. Saehee Jong – Oasis Center International
5. Rinat Kabiyeu – Oasis Center International
6. Susie Oh, Korean American Coalition, Board
7. Jin Sung - Executive Director, Oasis Center International, Chair of NDC
8. Alex Cha- Korean American Coalition, Board
9. Lisa Ruben – Executive Director, Partnership Scholars Program
10. Yves M. Mombeleur, Director Community Development, Royal Business Bank

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**Utilities Response 1 Continued:**

**Meeting Format**

- After opening remarks from both a utility representative and a representative from the NDC, the individual introduced themselves and shared what they wanted to get out of this meeting.

**Group Expectations for the Meeting**

- How to improve the messaging of utility supplier diversity programs
- How the NDC can help provide “leads” for new supplier diversity programs
- Utilities to provide an action plan with completion dates and timelines
- HR recruiting support
- Learn about utility goals and be a part of the discussion and look for ways to advocate for the underserved, together
- Learn how utilities can gain deeper penetration within customer programs
- Learn about the utilities philanthropic focus and improvements
- Learn about the community relations teams – what does it entail, are the hard-to-reach being reached, how does it work with energy efficiency and transportation
- How this group can help utilities with natural gas challenges (anti-fossil fuel movements)

**Discussions**

- Each utility shared background about their respective groups (Supplier Diversity, Customer Programs, Philanthropy and Environmental). NDC reps asked questions and the group had open discussions about the topics.

**Key Areas of Feedback**

**Supplier Diversity:**

- “Superb performance” – kudos to SDG&E and SoCalGas for their commitment to supplier diversity.
- Questions about technical assistance – how many suppliers get to be a supplier after going through the program? What is the process.
- Would like Supplier Diversity to continue working with the NDC and diverse suppliers to help with mentoring, connecting, giving candid feedback to candidates who still need work and sharing information.
- Questions and comments surrounding direct deposits, MDI and earmarking funds for people who win contracts – helping businesses get organized.
  - Supplier Diversity to share Meet the Prime, Technical Workshops and other opportunities with the NDC so they can share with their contacts.
  - Provide steps to encourage more investment and using MDIs for investment.

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**Utilities Response 1 Continued:**

Customer Programs:

- Questions surrounding financing for low-income customers.
- What is the rank of the statewide IOUs' CARE penetration rate? For instance, where does SoCalGas stand at 86% penetration compared to the other utilities?
- Confirm languages used include Tagalog.
- Questions around federal poverty guidelines – does NDC need to advocate to regulators to make additional changes since the cost-of-living is so much higher in even various parts of California, let alone the U.S.?
- Questions about EV outreach – feel SDG&E should do more.
- Ethnic media spend is not consistent – need to do more outreach and advertising with ethnic media.

Philanthropy:

- Would like know names/orgs of existing CAC members.
- Could NDC nonprofits be listed in our employee payroll deduction listing?
- Suggested utilities host a lunch and learn for employees to learn/meet NDC nonprofits.
- Perception that SDG&E philanthropy is to same orgs over and over and reasons for declining grant requests could be better explained – need to be more sensitive and/or give assistance to organizations to help them get approved for a grant – or possibly refer them to other funders.
  - Consider hosing a nonprofit summit with utility vendors/partners – invite other nonprofits – discuss capacity building and have a funders roundtable.

Environmental:

- SoCalGas and SDG&E gave a 5 min overview for each.
  - Schedule separate briefing for NDC on Renewable Gas, Power to Gas, Transportation.

**Meeting Adjourned**

The table below summarizes the questions and action items from the June 28, 2017, Annual Public Forum Meeting and provides SoCalGas and SDG&E's responses:

Item #	Description	Actions Taken
1	<ul style="list-style-type: none"> <li>• Questions about technical assistance – how many suppliers get to be a supplier after going through the program? What is the process.               <ul style="list-style-type: none"> <li>○ There are no guarantees for suppliers to get contracts after completing our technical assistance programs. However, after completing our program; suppliers are equipped with tools and knowledge (capability statement,</li> </ul> </li> </ul>	Responses provided

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	<p>understanding about licensing, certifications and safety requirements) to better to present their service offerings to the utilities. At the end of the final session; supplier have the opportunity to meet with contract agents and in some cases internal business clients.</p> <ul style="list-style-type: none"> <li>• Questions and comments surrounding direct deposits, MDI and earmarking funds for people who win contracts – helping businesses get organized. <ul style="list-style-type: none"> <li>○ Currently, there are no supplier diversity programs or CPUC mandates for earmarking funds for businesses that win contracts. However, we have a program that accelerates the payment for qualified small businesses. This program helps these small businesses by increasing their working capital, by paying suppliers faster with payment terms of net 15 days with no discount.</li> </ul> </li> <li>• Supplier Diversity to share Meet the Prime, Technical Workshops and other opportunities with the NDC so they can share with their contacts. <ul style="list-style-type: none"> <li>○ Both utilities host a number of workshops throughout the year for diverse suppliers to meet with prime businesses, internal clients and gain information about potential business opportunities. We will ensure to provide prior notification about key workshops that would benefit the members of the NDC.</li> </ul> </li> <li>• Provide steps to encourage more investment and using MDIs for investment <ul style="list-style-type: none"> <li>○ We are interested in learning more on what recommendations the NDC members have about investments.</li> </ul> </li> </ul>	
2	<p>Customer Programs:</p> <ul style="list-style-type: none"> <li>• Questions surrounding financing for low-income customers <ul style="list-style-type: none"> <li>○ The Energy Assistance Savings Program (ESA) provides weatherization, lighting and appliance replacement at no cost to qualifying customers.</li> </ul> </li> </ul>	Responses provided

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As such, there are not specific financing programs for low-income customers. For customers who wish to make additional energy efficiency upgrades to their homes that go beyond what is provided in the ESA program, they can bring costs down with our residential rebate program. Additionally, there are pilot financing programs under development for residential customers. Once available, low income customers will be able to take advantage of these programs as well. More information is available at

<http://www.gogreenfinancing.com/page/reel>

- What is the rank of the statewide IOUs' CARE penetration rate? For instance, where does SoCalGas stand at 86% penetration compared to the other utilities?
  - All four IOUs are in the 80% range.
    - SCG 86.2%
    - SDG&E 83.4%
    - SCE 83.8%
    - PG&E 88.9%
- Confirm languages used include Tagalog:
  - Both SoCalGas and SDG&E provide the CARE application in Tagalog (along with about a dozen other languages)
    - <https://www.sdge.com/documents/care-tagalog>
    - <https://www.socalgas.com/tl/save-money-and-energy/assistance-programs>
- Questions around federal poverty guidelines – does NDC need to advocate to regulators to make additional changes since the cost-of-living is so much higher in even various parts of California, let alone the U.S.?
  - The Guidelines are revised every year by the CPUC and all IOUs put them into effect starting June 1<sup>st</sup>. It would make the Programs harder to implement if we had different Guidelines set for different areas of California. (example: if a

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	<p>person resides in one zip code but moves to another that alone should not change the Guidelines). However, in the Residential CARE Restructuring external parties will be looking at different ways to structure the CARE Rate and Program Guidelines and this will be looked at.</p> <ul style="list-style-type: none"> <li>• Questions about EV outreach – feel SDG&amp;E should do more <ul style="list-style-type: none"> <li>○ SDG&amp;E will send more information shortly</li> </ul> </li> <li>• Ethnic media spend is not consistent – need to do more outreach and advertising with ethnic media <ul style="list-style-type: none"> <li>○ SoCalGas and SDG&amp;E’s media spend has been consistent.</li> <li>○ In addition to the media spend, SDG&amp;E has 250+ Energy Solutions Partners who help promote programs in language in publications including newsletter, eblasts, on social media platforms. Additionally, many of these partners offer in language, in person enrollment services for SDG&amp;E programs.</li> <li>○ SoCalGas works with approximately 50 Community Based Organizations and Faith-Based Organizations to do outreach. Many of these organizations provide in language outreach, for greatest effectiveness.</li> </ul> </li> </ul>	
3	<p>Share CAC member names/orgs with Faith</p> <ul style="list-style-type: none"> <li>• We are in the midst of confirming a few new members that have been in progress – will send list once new members are finalized.</li> </ul>	Completed
4	<p>Follow up with Faith/SRE on adding any NDC nonprofit not currently listed in Payroll Giving System</p> <ul style="list-style-type: none"> <li>• Requested that Faith provide a list of NDC 501c3 members. Will need the org name, address and federal tax ID number.</li> </ul>	Completed via new giving system
5	<p>Follow up with Faith/Jin to flesh out nonprofit summit idea</p> <ul style="list-style-type: none"> <li>• SoCalGas/SDG&amp;E &amp; Faith/Jin to set meeting.</li> </ul>	
6	<p>Schedule follow-up briefing between on natural gas policy</p>	Completed

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2. Provide detailed information on how SoCalGas and SDGE fulfilled their goal of increasing the annual dollar amount spent for SCORE diverse business enterprise (DBE) participants by 7% each year of the 2016 GRC period. (Section I.D.3 of the SDGE/SoCalGas/Joint Minority Party settlement in A.14-11-003).

**Response 2:**

<b>SCORE Performance</b>						
Company	Year	Base Spend	\$ Goal at 7%	Result	% over Goal	
SCG	2015	\$ 11.1	\$ 11.9	\$ 16.8	41.40%	
SCG	2016	\$ 16.8	\$ 18.0	\$ 19.8	10.00%	
SCG	2017	\$ 19.8	\$ 21.2	\$ 22.4	5.80%	
SDGE	2015	\$ 7.0	\$ 7.5	\$ 10.7	42.90%	
SDGE	2016	\$ 10.7	\$ 11.4	\$ 13.0	13.70%	
SDGE	2017	\$ 13.0	\$ 13.9	\$ 28.6	105.30%	

**SCG**

Our Smaller Contractor Opportunity Realization Effort (SCORE) program, aimed at businesses with revenues under \$5 million and fewer than 25 employees, continued to provide avenues to support diverse suppliers in entering into contracts with SoCalGas. In 2017, \$22.4 million was spent with SCORE contractors in engineering design, construction, transportation and inspection services. This included a three-year multimillion dollar contract to four smaller contractors for the Gas Infrastructure Protection Program (GIPP). Through SCORE, we look for internal projects to directly source with smaller firms. These opportunities can lead to participation in a competitive bid. Upon winning a contract, SCORE contractors receive on-the-job training and feedback from project managers and are invited to attend business boot camps designed to help them grow and build capacity. Two boot camps attracted more than 30 suppliers and focused on winning Requests for Proposals (RFP) and perfecting a social marketing presence.

**SDGE**

SCORE – 22 diverse suppliers participated in SCORE in 2017 with a total direct spend of approximately \$28.6 million. SDG&E had a 220 percent increase in spending over last year largely because of ongoing efforts in coaching and mentoring the suppliers. Small Contractor Opportunity Realization Effort provides opportunities for new and growing diverse suppliers companies to demonstrate their abilities to work with utilities through low dollar, short term agreements, typically under \$75,000.

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3. Provide detailed information on how SoCalGas and SDGE spent the \$650,000 annually committed for technical assistance and capacity building for small minority-owned businesses, and other matching funds received from other organizations. (Section I.G of the SDGE/SoCalGas/Joint Minority Party settlement in A.14-11-003). Include the names of organizations that received funds, the amount they received, the ethnic groups targeted by programs funded under this budget.

**Utilities Response 3:**

In the response to previous data request NDC 001 Questions 5 and 16, we listed organizations that had 1) received funds for technical assistance and capacity building program and 2) organizations where we only participated within their events without our funds. For this data request (NDC 006), all of the organizations listed below received funds for supporting their initiatives:

Community Based Organizations - SCG	Activities					
	Membership	Sponsorship	Technical Assistance	Networking	Economic Development	Capacity Building
American Indian Chamber of Commerce of California	X	X	X	X	X	X
Asian Business Association - Los Angeles	X	X	X	X	X	X
Asian Business Association - Orange County	X	X	X	X	X	X
Black Business Association - Los Angeles	X	X	X	X	X	X
California Black Chamber of Commerce	X	X	X	X	X	X
California Hispanic Chamber of Commerce	X	X	X	X	X	X
Chinese American Construction Professionals		X		X	X	X
Disabled Veteran Business Alliance	X	X	X	X	X	X
Elite Disabled Vetera-Owned Business Network - National	X	X		X		
Golden Gate Business Assocaiton		X		X		X
Greater Los Angeles African American Chamber of Commerce	X	X	X	X	X	X
Langston Bar Association		X				
Latin Business Assocaiton	X	X	X	X	X	X
Los Angeles Gay & Lesbian Chamber of Commerce	X	X	X	X	X	X
National Association of Women Business Owners	X	X	X	X	X	X
National Gay & Lesbian Chamber of Commerce	X	X	X	X	X	X
National Association of Minority Contractors - Southern California	X	X	X	X	X	X
National Latina Business Woman Association - Los Angeles	X	X	X	X	X	X
National Latina Business Women Association - Inland Empire		X	X	X		
National Minority Supplier Development Council	X	X	X	X	X	X
National Utilities Diversity Council	X		X			X
Recycling Black Dollars	X	X	X	X	X	X
Southern California Minority Supplier Development Council	X	X	X	X	X	X
Women's Business Enterprises Council - West	X	X	X	X	X	X
Veterans in Business	X	X	X	X	X	X
<b>Total Spend</b>	<b>\$235,000</b>					



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**Utilities Response 3:-Continued**

Programs & Technical Assistance - SCG	Activities		
	Technical Assistance	Capacity Building	Networking
UCLA MDE Program	X	X	X
UCLA SDV Program	X	X	X
Business Management & Leadership Academy	X	X	X
National Association of Minority Contractors Business Development Program	X	X	X
National Association of Women Business Owners Technical Assistance Program	X	X	X
Business Assessment, Higher Growth Strategies	X	X	X
Elevate Entrepreneur Institute, Spectrum Knowledge	X	X	X
Business Continuity, Guided Business Plan	X	X	X
<b>Total Spend</b>	<b>\$141,000</b>		

Community Based Organizations - SDG&E	Activities					
	Membership	Sponsorship	Technical Assistance	Networking	Economic Development	Capacity Building
American Indian Chamber of Commerce of California	X	X	X	X	X	X
Associated General Contractors Of America-San Diego Chapter Inc		X			X	X
Black Business Association - Los Angeles	X	X		X		X
Business Matchmaking Inc				X		X
California Asian Pacific Chamber Of Commerce	X			X	X	X
California Hispanic Chamber of Commerce	X	X	X	X		X
Central San Diego Black Chamber Of Commerce	X	X	X	X	X	X
Council For Supplier Diversity				X	X	X
Greater LA African American Chamber of Commerce		X		X		X
National Asian American Coalition		X		X		X
National Association of Women Business Owners - San Diego Chapter	X	X	X	X		X
National Minority Supplier Development Council	X	X		X		X
The Pacific Southwest Minority Supplier Development Council		X	X	X		X
The San Diego Elite DVBE Network	X	X	X	X		X
Women's Business Enterprise Council-West	X	X		X	X	X
<b>Total Spend</b>	<b>\$88,000</b>					

Programs & Technical Assistance - SDG&E	Activities		
	Technical Assistance	Capacity Building	Networking
B2G Now		X	
Brojure LLC		X	X
Cloud Custom Solution		X	X
Council For Supplier Diversity	X	X	
Kissinger Group	X		
Petteway Management Group		X	
Southwest Advancement Solutions	X		
<b>Total Spend</b>	<b>\$368,000</b>		

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4. What marketing and outreach activities are currently being used by SoCalGas that specifically or primarily target minority and low-income ratepayers? For each marketing and outreach activity, please specify what SoCalGas program is being promoted, which communities are being targeted, and the cost of the activity.

**Utilities Response 4:**

SoCalGas' current education efforts through marketing and outreach activities targeting minority customers, low-income customers, or both include: the promotion of low-income and energy efficiency programs, conservation, bill management, and natural gas safety and awareness. SoCalGas does not currently track cost at the detail level requested. A non-exhaustive list of these targeted activities, which span both General Rate Case-funded activities as well as activities funded through other proceedings, is provided below:

- **Customer Assistance Programs:** Messaging includes the 20 percent monthly discount through the California Alternate Rates for Energy program (“CARE”), no-cost home improvements through the Energy Savings Assistance program (“ESA”), a one-time grant of up to \$100 through the Gas Assistance Fund (“GAF”) and natural gas at a reduced rate for certain medical conditions through the Medical Baseline Allowance (“MBL”) program. The programs are promoted to low-income customers and have specifically targeted Chinese, Vietnamese, Korean, Tagalog, Hmong, Khmer, Armenian, Russian, Arabic, and Thai-speaking communities through either social media, email, web, community print, and online applications. CARE and ESA programs are funded by the Low-Income Assistance Programs proceeding. Additional details regarding marketing and outreach activities for the CARE and ESA program can be found in the Monthly and Annual Report Activity of Southern California Gas Company on Low Income Assistance Programs at the following link: [http://eestats.cpuc.ca.gov/EEGA2010Files/SCG/AnnualESAReport/SCG.AnnualESA\\_Narrative.2016.1.pdf](http://eestats.cpuc.ca.gov/EEGA2010Files/SCG/AnnualESAReport/SCG.AnnualESA_Narrative.2016.1.pdf). The 2017 annual report will be available after May 1, 2018. Customer Outreach for the GAF and MBL programs are GRC funded activities and are included in the costs presented in Exhibit SCG-20-WP, page 17.
- **General Safety Campaign:** The annual general safety campaign is designed to raise awareness and educate our customers on critical natural gas safety messaging, such as how to identify gas leaks, call 811 before you dig, emergency preparedness and what to do in the event of a natural gas leak. This activity targets all SoCalGas customers with specific messaging developed targeting Spanish, Chinese, Vietnamese, Korean, and Tagalog-speaking communities. Messaging includes, but is not limited to, digital advertising, print, radio, video, out-of-home media, social media, mobile, and paid search. The annual general safety campaign is a GRC-funded activity and costs for this campaign are included in Exhibit SCG-20-WP, page 6.

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- Winter Campaign: The annual winter campaign is designed to educate customers about conservation and to equip customers with the tools to manage their natural gas usage/bills. In addition, the campaign provides appliance safety tips. Although this campaign reaches all SoCalGas customers, it contains messaging specifically developed to target Spanish-speaking communities. This is a GRC-funded activity and its costs are included in Exhibit SCG-20-WP, page 6.
- Energy Upgrade California® – As directed in D.16-09-020, SoCalGas and the other investor-owned-utilities (IOUs) co-fund statewide marketing, education, and outreach (ME&O) activities administered by the statewide ME&O implementer, DDB San Francisco, a division of DDB Worldwide Communications Group, Inc. The Energy Upgrade California (EUC) initiative provides California residents and small-business owners with educational information to better understand and manage their energy use. The EUC initiative also refers customers to local IOU programs such as the Energy Savings Assistance Program and Energy Upgrade California – Home Upgrade. Statewide EUC messaging may include digital (including website), paid media, community outreach, and depending on the campaign, may target Spanish, Chinese, Korean, Vietnamese, Tagalog, and Hindi speaking communities. These activities are funded outside of the GRC through the statewide ME&O proceeding.
- Energy Upgrade California® – Home Upgrade: Messaging for this program is part of a statewide program to help customers reduce energy consumption in the state of California. The program provides incentives to customers who make energy efficient upgrades to their homes such as HVAC upgrades, weather sealing, and attic/wall insulation. Messaging includes website, print, and brochures. Although this activity reaches all SoCalGas customers, it contains specific messaging developed to target Spanish-speaking communities. This program is funded outside of the GRC through the energy efficiency proceeding.

SoCalGas also attends outreach events to educate customers, including minority and low income customer groups, regarding activities such as the Customer Assistance Programs, natural gas safety, and conservation. In 2017, SoCalGas attended over 75 outreach events educating on these activities. Further, the [socalgas.com](https://www.socalgas.com) website is available fully translated in Spanish (<https://www.socalgas.com/es/home>), with program webpages for bill assistance made available in Korean, Tagalog, Chinese, and Vietnamese. Print information for the CARE program application and Home Energy and Safety Guide are available in these languages as well as Arabic, Armenian, Farsi, Hmong, Khmer, Russian, and Thai found at <https://www.socalgas.com/more-languages>.

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5. What criteria and metrics does SoCalGas use to evaluate the effectiveness of the current marketing and outreach efforts specifically or primarily targeted toward minority and low-income ratepayers? Provide documentation of these evaluations.

**Utilities Response 5:**

SoCalGas utilizes various metrics, dependent on the type of marketing and outreach messaging, when evaluating the effectiveness of marketing and outreach activities inclusive of efforts toward minority and low-income customers. For example, print, web, digital, email, broadcast and social media messaging channels, metrics may include: number of media impressions, email open rates, web hits to SoCalGas landing page(s), click-through rates, paid and organic search results, likes, shares, and comments. Where applicable, metrics may be measured against historical values to determine performance.

Please see one example of the type of evaluation that SoCalGas conducts in the attachment:

- NDC-SEU-DR6-Q5 Attachment.pdf

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6. What marketing and outreach activities are currently being used by SDGE that specifically or primarily target minority and low-income ratepayers? For each marketing and outreach activity, please specify what SDGE program is being promoted, which communities are being targeted, and the cost of the activity.

**Utilities Response 6:**

SDG&E uses a variety of marketing and outreach activities funded through various proceedings, including the GRC, to reach low-income and ethnic audiences in the region. The media used includes newspaper, radio and television. From an outreach perspective, SDG&E promotes customer assistance programs (CARE, ESA, FERA, Medical Baseline) as well as overall energy efficiency, demand response and Integrated Demand Side Management (IDSM) programs. The tactics listed below were the primary channels used to reach low income and minority customers during calendar year 2017. As described in Ex. SDG&E-19, pages LCD-37 and LCD-38, SDG&E is requesting approval of incremental funding for a multicultural and language survey and a campaign to enhance our communications with multicultural audiences.

Media and Communications

- For low-income audiences, the primary programs promoted are CARE and ESA, which are funded through a separate proceeding. In 2017, the cost of media and communications for low-income programs, including ethnic audiences, was approximately \$1M. In addition to advertising, SDG&E used both direct mail and email to communicate with low-income and ethnic audiences. Every month, approximately 20,000 to 25,000 direct mail pieces are mailed to individuals targeted for the CARE/ESA program. Emails are sent to approximately 150,000 customers who may qualify for low-income programs during the year. These customers received multiple emails with targeting based on demographic and other segmentation techniques. Low-income customers also receive general messaging on pipeline safety, emergency preparedness and seasonal energy messages.
- For ethnic audiences, the programs promoted are CARE/ESA, emergency preparedness, pipeline safety, and seasonal energy messages. Of these, the CARE/ESA and pipeline safety communications are funded through separate proceedings. The emergency preparedness and seasonal energy messages are funded through the GRC O&M. In 2017, a total of approximately \$220K funded through various proceedings was spent for ethnic audiences.

Outreach

SDG&E's outreach programs are designed to promote a holistic set of energy solutions to mass audiences, and match programs to fit customer needs. Therefore, there are specific outreach tactics designed to reach low income customers who qualify for CARE/FERA and ESA that

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include multicultural and multiethnic outreach. And, there may be crossover with other outreach tactics that promote energy efficiency, demand response, energy management, IDSM, among others. SDG&E estimates that the 2017 cost of outreach programs for low-income and ethnic audiences is approximately \$1.4 million, funded through various proceedings.

- For low income audiences, the primary programs promoted are CARE/FERA and ESA, but all relevant customer programs, services, tools and rates are promoted. There is heavy crossover with multicultural and ethnic audiences. Primary Outreach tactics for these audiences include:
  - Energy Solution Partner Network & Event Series: 200+ community-based/non-profit organizations, most of which represent multi-cultural/multi-lingual, low income and special needs communities. Partners performed more than 2,900 activities of which 904 included assistance programs in 2017. These included hosting events, presentations, workshops and sending messaging in various organization communications (social media, e-blasts, newsletters, websites).
  - Community Event Series: SDG&E's Outreach team participated at community events throughout the year, many of which serve diverse communities. Our diverse outreach staff represents African American, Asian, Middle Eastern, Pacific Islander and Hispanic communities who speak a variety of associated languages. In 2017, SDG&E participated in over 600 events. Examples of these events include Chinese New Year Fair, National Asian American Coalition's Asian Cultural Festival, Brazilian Day San Diego, NAACP Meeting and La Maestra City Heights Health Fair.
  - Care Capitation Partners – Twenty-two social service organizations help customers complete CARE applications through source coded enrollment forms. They are compensated (\$20) for each new enrollment. In 2017, CARE partners brought in 3,595 new enrollments.
  - Door-to-Door, Call Campaign & Multicultural/Multilingual Outreach Contractors: In addition to the Energy Solutions Partners, SDG&E's contracted with vendors who implement grass-roots outreach and canvassing in low income, diverse communities at ethnic markets, swap meets, places of worship, community fairs and festivals and at unemployment and career development sites, among others. In 2017, these contractors brought in over 22,000 new CARE program enrollments.

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7. What criteria and metrics does SDGE use to evaluate the effectiveness of the current marketing and outreach efforts specifically or primarily targeted toward minority and low-income ratepayers? Provide documentation of these evaluations.

**Utilities Response 7:**

SDG&E uses a variety of techniques to evaluate effectiveness of outreach efforts designed to generate awareness. The evaluation of effectiveness is based on the communications channel used. Also considered, is the offer being made and if there is a direct call to action. Energy Solutions Partners & community events are evaluated based on execution of the agreement requirements (reach, attendance, frequency, events held, number of social media posts, number of tweets, among others). For outreach campaigns that drive program enrollment, SDG&E uses source coding to verify when and where the customer enrollment occurred. In addition, SDG&E outreach advisors meet regularly with Energy Solutions Partners as well as attend roundtable events to gather information on customer feedback and make any adjustments necessary.

For email communications, the measures used to evaluate effectiveness are open rate, click rate and effective rate. During 2017, a total of 595,351 emails were sent to a target audience of approximately 150,000 potential CARE-qualifying customers, so each customer would have received up to four emails during the year. Below are the performance figures for this particular email campaign. Open, click and effective rates all exceed the utility industry norms.

<b>Sent</b>	<b>Received</b>	<b>Opened</b>	<b>Clicked</b>	<b>Open Rate</b>	<b>Click Rate</b>	<b>Effective Rate</b>
595,351	594,604	214,691	26,747	36%	4.5%	12%

For digital advertising a comprehensive report is provided on a variety of measures including impressions, clicks, cost per click, click through rate and more. Please see NDC-SEU-006 Q7 Attachment-Redacted.

Direct mail effectiveness is measured based on the overall response rate, or number of customers that sign up for the offer. Other measures used include changes to website traffic during a communications period and feedback from customers regarding specific communications.

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8. What are the target levels of employee diversity at SoCalGas for the 2019 GRC period, and how are these levels set? Please indicate the target levels of employee diversity separately for SoCalGas officers, directors, managers, and other employee groups.

**Utilities Response 8:**

SoCalGas creates diversity goals to meet its affirmative action obligations, but it does not establish employee quotas by race, gender, or any other protected category. In establishing these goals pursuant to the Affirmative Action Program, it is important to understand that SoCalGas does not intend its program to, and it will not use it to, discriminate against any applicant or employee because of race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations. Please see SoCalGas' response to NDC-06 Question 12.



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9. For each year since 2012, what were the target levels of employee diversity at SoCalGas and were they met? Please indicate the target levels of employee diversity separately for SoCalGas officers, directors, managers, and other employee groups.

**Utilities Response 9:**

The Office of Federal Contract Compliance Program (OFCCP), the auditor of Sempra Energy (and therefore SoCalGas' Functional Affirmative Action Plans (FAAP)), has not found that SoCalGas failed to comply with its obligations under its FAAPs. Please see SoCalGas' response to NDC-06 Questions 8 and 12.

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10. How are target levels of employee diversity at SoCalGas set? What department is responsible for setting and achieving SoCalGas' employment diversity goals?

**Utilities Response 10:**

The Office of Federal Compliance Contractors Programs (OFCCP) establishes the affirmative action planning. It includes conducting analysis of labor market availability and workforce representation.

The Diversity & Inclusion and Staffing groups are responsible for the affirmative action planning process for SoCalGas.

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11. What populations does SoCalGas believe are underrepresented in their workforce? What are the specific efforts being undertaken by SoCalGas that target outreach toward those underrepresented workforce populations?

**Utilities Response 11:**

For the reasons stated in response to Question 12, and in reliance on those objections, SoCalGas will not provide details from its FAAPs on underrepresented groups in its workforce. Notwithstanding, SoCalGas' efforts to target underrepresented groups is explained in the non-privileged portion of FAAP 8, which is being produced with the response to Question 12.

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12. For each year since 2012, please provide copies of SoCalGas's federally-required affirmative action plans, EEOC, OFCCP, and VETS100 reports. (SCG-32 at MG-36).

**Utilities Response 12:**

SoCalGas complies with its legal obligations to meet its affirmative action obligations. These obligations stem from federal requirements found in Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended. In addition, SoCalGas complies with all other equal employment laws, including Title VII of the Civil Rights Act of 1964, or any federal, state or local law and has been developed to reaffirm the Company's policy of providing equal employment opportunity for all persons without regard to race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations.

SoCalGas creates diversity goals to meet its affirmative action obligations, but it does not establish employee quotas by race, gender, or any other protected category. In establishing these goals pursuant to the Affirmative Action Program, it is important to understand that SoCalGas does not intend its program to, and it will not use it to, discriminate against any applicant or employee because of race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations.

On an annual basis, SoCalGas prepares its Affirmative Action Plans (along with Sempra Energy and its affiliates), which are available for audit by the OFCCP. The summary and analysis of our workforce is conducted by an external law firm and done at the direction of counsel and it is therefore privileged and confidential.

Pursuant to its agreement with the OFCCP, Sempra Energy creates different Functional Affirmative Action Plans (FAAP) for 27 different functional areas. For example, the SoCalGas headquarters plan is FAAP 8 and it has its own plan and other data. Each FAAP ranges in size, but to provide some context, FAAP 8 is over 360 pages in length. Thus, the SoCalGas FAAPs are many thousands of pages for a single year.

The contents of the FAAPs are extremely sensitive in nature because they endeavor to parse out demographic data on our workforce and applicants. The data includes some very small departments or groupings. For example, in FAAP 8, some classifications contain only a few actual employees and thus, producing a document with details on race or disability would raise serious privacy concerns for employees in those workgroups.

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**Utilities Response 12 Continued:**

Finally, SoCalGas' seeks funds in this GRC to fund positions and resources required to meet its federal affirmative action requirements and to continue executing its diversity initiatives, such as through the many diversity programs outlined in the revised testimony of Mary Gevorkian, SCG-32, at section IV.B. In particular, SCG is seeking \$557,000 for its shared services Diversity and Inclusion costs, which includes a modest increase to add an advisor to “ (1) support and grow the VALOR program which started in May 2015, including the costs to implement web-based software solutions for the VALOR and M-Power mentoring programs to track employee engagement and participation; (2) support company-wide unconscious bias awareness training committed to by Sempra CEO, Debra Reed and SoCalGas CEO Patricia Wagner; and (3) provide additional resources required to develop and implement communication and branding campaigns to reach internal and external stakeholders.” Thus, data on our employee or applicant race, gender, or any other protected category is not relevant to the Company's request for funding. The only pertinent data point is that the Company requires funds to comply with its federal obligations and to meet the goals of its diversity programs, details of which have been entered into evidence through testimony and workpapers.

For the above reasons, SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Given the size of the materials requested, SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence. These reports are provided to the federal government only pursuant to the Functional Affirmative Action Program Agreement between Sempra Energy and The Office of Federal Contract Compliance Programs U.S. Department of Labor (“FAAP Agreement”). In the FAAP Agreement, the OFCCP agrees it will treat the information as “sensitive and confidential to the maximum extent possible under the Freedom of Information Act (FOIA) and as such, SoCalGas further objects to this request on the grounds that it seeks the production of confidential information containing extremely sensitive information. SoCalGas designates this information as “Protected Materials – Government Eyes Only” in which case the documents can only be reviewed by a federal government representative. Finally, SoCalGas objects to the request in that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or evidentiary doctrine. No information protected by such privileges or evidentiary doctrines will be knowingly disclosed and exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure.

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**Utilities Response 12 Continued:**

Subject to and without waiving the foregoing objection, SoCalGas will provide the non-privileged portion of the 2016-2017 FAAP 8, which describes the Company's policy-related program information as required by the OFCCP and in compliance with VETS100 (now known as VETS-4212). This information is largely identical to prior years and thus, the 2016-2017 version is sufficiently responsive. Please see the attachment NDC-SEU-006 Q12 Attachment\_FAAP 8 SoCalGas Excerpt.pdf for the non-privileged portion of the 2016-2017 FAAP 8.

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13. For each year since 2012, please describe the training programs that have been provided to SoCalGas employees on diversity-related topics, including the dates, duration, and topics of each program. (SCG-32 at MG-36).

**Utilities Response 13:**

See attached document titled NDC-SEU-006 Q13 Attachment for the SoCalGas listing of diversity-related trainings, including the dates, durations and topics of each program.

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14. For each year since 2012, describe the investigation by SoCalGas' Diversity & Inclusion department into complaints pertaining to harassment or discrimination on the basis of ethnicity, including the number and nature of the complaints and the ultimate resolution of the matters. (SCG-32 at MG-36).

**Utilities Response 14:**

SoCalGas objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Further, the request calls for private employee information that will not be disclosed. No information protected by such privileges or evidentiary doctrines will be knowingly disclosed and exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure. Notwithstanding our objection, SoCalGas confirms that our company practice is to thoroughly investigate all complaints in accordance with our Ethics and Compliance Helpline procedures.



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15. For each year since 2012, describe the response by SoCalGas' Diversity & Inclusion department to complaints submitted to the EEOC and the California Fair Housing and Employment Act (FEHA), including the number and nature of the complaints and the ultimate resolution of the matters. (SCG-32 at MG-36).

**Utilities Response 15:**

The Company responds to complaints made to the EEOC and/or the Department of Fair Employment and Housing (which enforces the FEHA) the same way as to complaints made internally. It conducts a thorough investigation at the direction of legal counsel and reports the results back to legal counsel. Every investigator has been trained in Equal Employment Opportunity laws and attends annual investigation training. We decline to provide specifics regarding complaints due to the fact that the investigations are conducted at the direction of counsel and are covered by the attorney client privilege, as well as the involved employees' rights to privacy.

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16. Provide detailed information on SoCalGas' M-Power program, including how many employees participate as mentors and mentees, the ethnicities, title and positions of the participants.

**Utilities Response 16:**

M-Power is a structured mentoring program that gives diverse employees the experience needed to enhance their careers across all of Sempra Energy. Mentor and mentee pairs follow a guidebook containing a suggested roadmap of topics including setting professional goals, being an inclusive leader, networking, and transferring knowledge. For information on the number of participants and their titles and positions, refer to the attachment: NDC-SEU-006 Q16 Attachment. Note – information regarding the participants' ethnicities is not provided, since the Company does not solicit that information from M-Power participants.

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17. Provide detailed information on SoCalGas' VALOR program, including how many employees participate as mentors and mentees, the ethnicities, title and positions of the participants.

**Utilities Response 17:**

Veterans Advancing, Leading, and Optimizing Results (VALOR) is SoCalGas' veteran onboarding program focused on strategic areas such as recruitment, employee development, and outreach. Mentors and mentees follow a structured guide and cover topics like internal and external resources, company culture, and transferring military skills to a corporate environment. See spreadsheet: NDC-SEU-006 Q17 Attachment. Note – information on the participants' ethnicities is not provided, since SoCalGas does not solicit that information from VALOR program participants.

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18. Please explain if minority veterans participate in SoCalGas' M-Power or VALOR program. If minority veterans participate in both programs, please indicate the number of dual participants there are.

**Utilities Response 18:**

The Company does not solicit demographic information from participants of the M-Power or VALOR programs, therefore that data is unavailable.

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19. SoCalGas' HR Diversity forecast adjustment for 2017 of \$41,000 is attributed to resuming normal activities from employees working on other projects or on leave during 2016. (SCG-32-WP at 77). If pre-2016 normal activities are being resumed in 2017, please explain why the total 2017 labor forecast of \$334,000 is higher than the 2015 cost of \$319,000. (SCG-32-WP at 75).

**Utilities Response 19:**

The difference of \$15,000 between the 2015 and 2017 labor forecasts is due to labor cost escalation.

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20. How many employees are in SoCalGas' Diversity & Inclusion department? Please provide their titles and the number of employees in each position.

**Utilities Response 20:**

Currently there is one Senior Diversity Advisor and 2 Diversity Advisors. The Senior Diversity Advisor is the acting Manager, until a manager is selected.

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21. In SoCalGas' Diversity & Inclusion department, which employee(s) previously handled the responsibilities assigned to the additional one advisor position that accounts for the \$100,000 forecast adjustment for 2018 and 2019? (SCG-32 at MG-37, SCG-32-WP at 77).

**Utilities Response 21:**

The M-Power and VALOR work has previously been managed by the Sr. Diversity and Inclusion Advisor and Diversity and Inclusion Advisor. However, these programs have expanded over the years and now require more resources. Furthermore, additional training is expected to be implemented (e.g., unconscious bias training), which will also require additional resources.

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22. In SoCalGas' Diversity & Inclusion department, what accounts of the \$7,000 non-labor forecast adjustments for 2018 and 2019? (SCG-32-WP at 77).

**Utilities Response 22:**

The \$7,000 non-labor is to support the new Diversity and Inclusion Advisors and will cover travel related expenses due to site visits, training, etc.



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23. Provide detailed information on the changes in OFCCP regulations and EEO-1 filing requirements that require additional support in the Diversity & Inclusion (D&I) department. (SCG-32 at MG-37). Prior to the additional advisor hired in 2018, which employee(s) in the D&I dept were responsible for responding to changes in OFCCP regulations and EEO-1 filing requirements?

**Utilities Response 23:**

At the time the testimony was prepared, the EEOC had expanded the pay data reporting requirements of the EEO-1 form. This would have necessitated substantial changes to the Human Resource Information Systems (HRIS) data collection process to create the framework for reporting. The change was later suspended and the current reporting requirements will remain in effect for the time being. Although, at this time, the Diversity & Inclusion team will not have to support the additional EEO reporting effort, the department has taken on other incremental work related to the VALOR and M-Power programs, unconscious bias training, and external communication and branding campaigns to reach internal and external stakeholders which require additional staffing. Accordingly, SoCalGas' request to add an advisor remains.

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24. Please describe the need for web-based software to track employee participation in the M-Power and VALOR programs. (SCG-32 at MG-37). How was participation tracked previously?

**Utilities Response 24:**

The M-Power program began in 2011 with 55 participants across the Sempra family of companies. It proved to be a successful program and has grown every year since. The most recent “class” had 155 participants, and interest continues to grow. M-Power matches employees from across the Sempra family of companies and across the entire Southern California region.

Since it began, M-Power has had a program manager in the Diversity & Inclusion department. In addition to all of their other responsibilities, this person manages M-Power recruitment, matching, training, networking events, graduations, content, and communication throughout the term of the program. Until now, this has all been done over Outlook email and a collection of Excel spreadsheets and PDF documents. This has become cumbersome, inefficient, and outdated. There is software available to track mentoring, which would allow SoCalGas to not only increase the number of participants with ease, but also improve the experience with better technology and dynamic content. Transitioning to the web-based software will help us meet our goals and further develop our diverse workforce.

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25. How many company-wide unconscious bias awareness trainings did Sempra CEO Reed and SoCalGas CEO Wagner commit to? (SCG-32 at MG-37).

**Utilities Response 25:**

By signing onto the CEO Action for Diversity & Inclusion, Debbie Reed has committed publicly to expanding unconscious bias awareness training to the entire Sempra workforce (<https://www.ceoaction.com>). This will entail numerous in-person workshops as well as an online program of continuous education. Designing and delivering this material to numerous locations, functions, and levels of employees will take time and resources. The specific number of training courses have not been determined.

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26. For each year since 2012, how many training programs has the SoCalGas Diversity & Inclusion department provided to employees? Indicate the date, topic, type, and number of each training.

**Utilities Response 26:**

Please refer to the attachment in response to Question 13.

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27. Please provide detailed information on the “communication and branding campaigns to reach internal and external stakeholders” that the Diversity & Inclusion department must develop. (SCG-32 at MG-37).

**Utilities Response 27:**

The Diversity & Inclusion department has had success creating programs and educating pockets of the workforce to help create an inclusive workplace. The department has not, however, been able to get the message out to the entire workforce. That has left many employees unaware of the department, its efforts, and the very message the Diversity & Inclusion department aims to spread.

Although the Diversity & Inclusion department is the subject matter expert in diversity and inclusion, they need the expertise of communication, branding, and marketing professionals to ensure all employees are well-versed in the practices of maintaining a work environment where everyone feels like they belong.

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28. Does SoCalGas use a consulting service to support their Human Resource Information Systems, similar to the service Sparta Consulting provided to SDGE? (SDGE-30 at TT-22). If so, could SoCalGas realize similar cost savings by assigning such support responsibilities to an employee, similarly to SDGE?

**Utilities Response 28:**

SoCalGas does not use a consulting service, such as Sparta Consulting, to support the Human Resource Information Systems (HRIS). All the responsibilities assigned to supporting the HRIS already reside with SoCalGas employees.

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29. What are the target levels of employee diversity at SDGE for the 2019 GRC period? Please indicate the target levels of employee diversity separately for SDG&E officers, directors, managers, and other employee groups.

**Utilities Response 29:**

SDG&E creates diversity goals to meet its affirmative action obligations, but it does not establish employee quotas by race, gender, or any other protected category. In establishing these goals pursuant to the Affirmative Action Program, it is important to understand that SDG&E does not intend its program to, and it will not use it to, discriminate against any applicant or employee because of race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations. Please see SDG&E's response to NDC-06 Question 40.

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30. For each year since 2012, what were the target levels of employee diversity at SDGE and were they met? Please indicate the target levels of employee diversity separately for SDG&E officers, directors, managers, and other employee groups.

**Utilities Response 30:**

The Office of Federal Contract Compliance Program (OFCCP), the auditor of Sempra Energy (and therefore SDG&E's Functional Affirmative Action Plans (FAAP)), has not found that SDG&E failed to comply with its obligations under its FAAPs. Please see SDG&E's response to NDC-06 Questions 29 and 40.



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31. How are target levels of employee diversity at SDGE set? What department is responsible for setting and achieving SDGE's employment diversity goals?

**Utilities Response 31:**

The Office of Federal Compliance Contractors Programs (OFCCP) establishes the affirmative action planning. It includes conducting analysis of labor market availability and workforce representation.

The Diversity & Workforce Management group is responsible for the affirmative action planning process for SDG&E.

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32. What populations does SDGE believe are underrepresented in their workforce? What are the specific efforts being undertaken by SDGE that target outreach toward those underrepresented workforce populations?

**Utilities Response 32:**

For the reasons stated in response to Question 40, and in reliance on those objections, SDG&E will not provide details from its FAAPs on underrepresented groups in its workforce. Notwithstanding, SDG&E's efforts to target underrepresented groups is explained in the non-privileged portion of FAAP 1, which is produced with the response to Question 40.

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33. Describe what is involved in SDGE's Diversity and Workforce Management department's employee-related function of "Diversity Outreach". (SDGE-30 at TT-19).

**Utilities Response 33:**

SDG&E's diversity outreach efforts consist of developing and executing strategic diverse recruiting plans. This includes external recruiting activities to attract, retain, and employ a qualified workforce that mirrors the communities we serve.

External activities include:

- Partnering with diverse organizations to promote career opportunities.
- Participating in diverse career fairs, conferences, employer panels and in some cases sponsoring our own.
- Utilizing recruitment marketing and social media to market our positions on diversity job sites.
- College recruiting; we recruit at local universities and community colleges. In addition, where necessary, to recruit specialized, technical talent we expand recruitment areas to include historically black colleges to ensure a diverse pool.

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34. Please explain how SDGE’s Diversity and Workforce Management “Diversity Outreach” activities supporting compliance with OFCCP, DOT, and DHS regulations relates to outreach efforts to diverse potential employees. (SDGE-30 at TT-20).

**Utilities Response 34:**

Please see response for NDC-006 Question 33.

Please also note, neither DOT, nor DHS regulations, pertain to Diversity Outreach. Refer to (SDG&E-30 at TT-20) for further clarification.

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35. Provide detailed information on SDGE’s Diversity and Workforce Management department’s “strategic diversity recruiting plans”. (SDGE-30 at TT-20). Include the names of partner organizations, indicate how many employees have been hired through referrals from each partner organization, and the hired employee’s ethnicity and/or veteran status.

**Utilities Response 35:**

A few of the organizations SDG&E partners with include, but are not limited to:

- American Indian Science and Engineering Society (AISES)
- Getting Hired
- Great Minds in STEM, Hispanic Engineer National Achievement Awards Conference (HENAC)
- Military MOJO
- National Society of Black Engineers (NSBE)
- Society of Asian Scientists and Engineers (SASE)
- The East Los Angeles Community Union (TELACU)
- Women of Color STEM

SDG&E does not track its hires based on references to any particular organization.

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36. Please explain how the SDGE Diversity and Workforce Management department cost savings relative to Sparta Consulting supporting HR Information Systems were realized for 2017, 2018, 2019. (SDGE-30-WP at 46). Also explain why the amount of savings increases each year, and whether they will continue to increase past 2019.

**Utilities Response 36:**

The total annual savings related to Sparta Consulting is \$150k by TY 2019. There are embedded costs in BY 2016 of \$50k. The increase in savings from 2017-2019 reflects the incremental savings, with full realization in TY 2019.

The savings will not increase past 2019.

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37. How many employees are in SDGE's Diversity and Workforce Management department? Please provide their titles and the number of employees in each position. Please also indicate whether the one management employee that is the cost driver behind the HR Information Systems forecast (SDGE-30 at TT-22) is included in this count.

**Utilities Response 37:**

The Diversity & Workforce Management department is comprised of 11 employees and includes the following functions: Staffing, Diversity Outreach, Operations and Compliance and HRIS.

The titles and number of each position are as follows and includes the HRIS employee:

- 1 - Director – Diversity & Workforce Management
- 2 - Senior Staffing Advisors
- 2 - Staffing Advisors
- 1 - Staffing & Recruiting Specialist
- 1 – Staffing Operations & Compliance Manager
- 1 – Staffing Operations Advisor
- 2 - HR Coordinators
- 1 – Principal HRIS Advisor

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38. Please provide additional information on the “skills survey” being used by SDGE’s Diversity and Workforce Management department. (SDGE-30 at TT-20). Specifically, how do the surveys identify qualified minority applicants, how are the survey questions developed, and what analysis of survey responses does the software provide?

**Utilities Response 38:**

The objective of the SkillSurvey 360 is to include observable behaviors that enable us to provide a measurement of a candidate’s “soft” skills.

SkillSurvey, Inc. uses government and academic research databases of job-specific validated behaviors and competency models from successful companies and educational institutions.

Candidates are presented with the option to answer questions that gather demographic information (e.g., gender, race/ethnicity); employers do not have access to this information. SkillSurvey, Inc conducts regular analyses of the information to ensure there are no biases. Their recent analysis of 2017 candidate data reveals no statistical differences in candidates when analyzed by gender, race/ethnicity and age group.



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39. Please explain the differences and/or overlapping responsibilities of SDGE’s “Diversity & Workforce Management” department, and the “HR Diversity” department.

**Utilities Response 39:**

Below is a summary highlighting some of the main responsibilities of the Diversity & Workforce Management department and the HR Diversity department. There are no overlapping responsibilities. Please see (SDGE-30 at TT-19 and TT-26) for further clarification.

The Diversity & Workforce Management department consists of the following functions:

- Staffing: recruiting, hiring and on-boarding of new employees, manages internal moves and inter-company transfers
- College Recruiting Programs
- Employment Compliance: develops processes for the Staffing functions to ensure compliance with all applicable regulations and performs internal audits
- Diversity Outreach: partner with external organizations to ensure we are working to attract diverse candidates and/or building a diverse workforce pipeline
- HRIS

The HR Diversity department consists of the following functions:

- Investigates complaints under Title VII of the 1964 Civil Rights Act (Title VII), the Americans With Disabilities Act (ADA), and the California Fair Housing and Employment Act (FEHA)
- Develops and conducts training for all supervisory employees on sexual harassment, bullying, and other general non-discrimination/harassment or retaliation precepts, as required by California law
- Develops and conducts training for all employees in harassment, discrimination, and sexual harassment prevention in the workplace
- Conducts investigations into any complaints that have to do with harassment or discrimination on the basis of sex, race, national origin, religion, color, disability, sexual orientation and any other protected class
- Oversees the creation and maintenance of the company-wide Employee Diversity Council, as well as several local diversity committees located at various company locations

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40. For each year since 2012, please provide copies of SDGE's federally-required affirmative action plans, EEO-1, VETS 100, and OFCCP reports. (SDGE-30 at TT-26, TT-27).

**Utilities Response 40:**

SDG&E complies with its legal obligations to meet its affirmative action obligations. These obligations stem from federal requirements found in Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended. In addition, SDG&E complies with all other equal employment laws, including Title VII of the Civil Rights Act of 1964, or any federal, state or local law and has been developed to reaffirm the Company's policy of providing equal employment opportunity for all persons without regard to race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations.

SDG&E creates diversity goals to meet its affirmative action obligations, but it does not establish employee quotas by race, gender, or any other protected category. In establishing these goals pursuant to the Affirmative Action Program, it is important to understand that SDG&E does not intend its program to, and it will not use it to, discriminate against any applicant or employee because of race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations.

On an annual basis, SDG&E prepares its Affirmative Action Plans (along with Sempra Energy and its affiliates), which are available for audit by the OFCCP. The summary and analysis of our workforce is conducted by an external law firm and done at the direction of counsel and it is therefore privileged and confidential.

Pursuant to its agreement with the OFCCP, Sempra Energy creates different Functional Affirmative Action Plans (FAAP) for 27 different functional areas. For example, the SDG&E headquarters plan is FAAP 1 and it has its own plan and other data. Each FAAP ranges in size, but to provide some context, FAAP 1 is over 350 pages in length. Thus, the SDG&E FAAPs are many thousands of pages for a single year.

The contents of the FAAPs are extremely sensitive in nature because they endeavor to parse out demographic data on our workforce and applicants. The data includes some very small departments or groupings. For example, in FAAP 1, some classifications contain only a few actual employees and thus, producing a document with details on race or disability would raise serious privacy concerns for employees in those workgroups.

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**Utilities Response 40 Continued:**

For the above reasons, SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Given the size of the materials requested, SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence. These reports are provided to the federal government only pursuant to the Functional Affirmative Action Program Agreement between Sempra Energy and The Office of Federal Contract Compliance Programs U.S. Department of Labor ("FAAP Agreement"). In the FAAP Agreement, the OFCCP agrees it will treat the information as "sensitive and confidential to the maximum extent possible under the Freedom of Information Act (FOIA) and as such, SDG&E further objects to this request on the grounds that it seeks the production of confidential information containing extremely sensitive information. SDG&E designates this information as "Protected Materials – Government Eyes Only" in which case the documents can only be reviewed by a federal government representative. Finally, SDG&E objects to the request in that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or evidentiary doctrine. No information protected by such privileges or evidentiary doctrines will be knowingly disclosed and exceeds the scope of permissible discovery under Rule 10.1 of the Commission's Rules of Practice and Procedure.

Subject to and without waiving the foregoing objection, SDG&E will provide the non-privileged portion of the 2016-2017 FAAP 1, which describes the Company's policy-related program information as required by the OFCCP and in compliance with VETS100 (now known as VETS-4212). This information is largely identical to prior years and thus, the 2016-2017 version is sufficiently responsive. Please see the attachment NDC-SEU-006 Q40 Attachment\_FAAP 1 SDG&E Excerpt.pdf for the non-privileged portion of the 2016-2017 FAAP 1.

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41. For each year since 2012, describe the investigations by the HR Diversity department into complaints under Title VII of the 1964 Civil Rights Act, the California Fair Housing and Employment Act (FEHA), and other “complaints having to do with harassment or discrimination” pertaining to ethnicity, including the number and nature of the complaints, ethnicity of the complainant, and the ultimate resolution of the matters. (SDGE-30 at TT-26, TT-27).

**Utilities Response 41:**

SDG&E objects to the extent the request seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. Further, the request calls for private employee information that will not be disclosed. No information protected by such privileges or evidentiary doctrines will be knowingly disclosed and exceeds the scope of permissible discovery under Rule 10.1 of the Commission’s Rules of Practice and Procedure. Notwithstanding our objection, SDG&E confirms that our company practice is to thoroughly investigate all complaints in accordance with our Ethics and Compliance Helpline procedures.

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42. For each year since 2012, describe the training programs that have been provided to employees on diversity-related topics, including the dates, duration, and specific topics of each program. (SDGE-30 at TT-26).

**Utilities Response 42:**

The company provides AB1825 and AB2053 training in compliance with California state law. Without exception, all new supervisors must attend two hours of classroom training within the first six months of obtaining the supervisory role. After the initial training, each supervisor must complete a two-hour training course on a biennial basis. The follow-up training is offered online, or the supervisors can attend a classroom session.

In addition to state-mandated training, the company's Diversity & Inclusion team provides quarterly information and training sessions for the employee diversity and inclusion council comprised of volunteer employees throughout the Sempra family of companies and separately for local diversity and inclusion council volunteer leadership.

See attachment NDC-SEU-006\_Q42\_Attachment for SDG&E diversity-related training details.

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43. For each year since 2012, provide itemized information on the non-labor expenses incurred by SDGE’s HR Diversity department. For all trainings, indicate the dates and topics covered, as well as if they pertain to particular statutory or regulator agency requirements (e.g. AB1825 or EEOC).

**Utilities Response 43:**

Category	2012	2013	2014	2015	2016	2017
AB1825 Online and Classroom Training	\$7,551	\$3,426	\$5,407	\$7,878	\$11,256	\$4,360
Consulting Services	\$26,493	\$11,446	\$20,460	\$6,596	\$8,150	\$19,425
Diversity & Inclusion Events	\$11,564	\$16,715	\$16,610	\$15,561	\$19,093	\$17,218
Office furnishings, computer hardware, mobile reimbursement	\$3,218	\$5,423	\$912	\$648	\$1,255	\$1,451
Travel	\$6,796	\$4,503	\$6,706	\$6,187	\$6,878	\$2,956
Diversity & Inclusion Manager	\$0	\$0	\$1,939	\$0	\$0	
EEAC Training						
<b>Total Non-Labor (Nominal Dollars)</b>	<b>\$55,622</b>	<b>\$41,513</b>	<b>\$52,034</b>	<b>\$36,870</b>	<b>\$46,632</b>	<b>\$45,410</b>

The attachment NDC-SEU-006\_Q42\_Attachment provided in response to Question 42 includes the SDGE training details in response to this question also.

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44. Please provide a breakdown of the \$25,000 forecast increase starting in 2017 for SDGE’s HR Diversity department non-labor costs. (SDGE-30-WP at 70). Also, specifically explain why additional trainers and consultants were necessary for outreach/seminars for diversity education in support of AB1825 and AB1823.

**Utilities Response 44:**

<b>Category</b>	<b>2018-2019</b>
AB1825 Online and Classroom Training	\$3,000
Consulting Services	\$5,000
Diversity & Inclusion Events	\$10,000
Travel	\$2,000
Diversity & Inclusion Manager EEAC Training	\$5,000
TOTAL (Constant 2016\$)	\$25,000

In 2017, Sempra’s CEO joined approximately 400 CEOs throughout the world in the CEO Action for Diversity & Inclusion, a CEO-driven business commitment to advance diversity and inclusion within the workplace. The commitment includes a three-part pledge:

1. We will continue to make our workplaces trusting places to have complex, and sometimes difficult, conversations about diversity and inclusion.
2. We will implement and expand unconscious bias education.
3. We will share best—and unsuccessful—practices.

The company anticipates additional costs to expand Diversity & Inclusion training, travel and educational events to support pledge initiatives such as:

- Creating and maintaining environments, platforms, and forums for a trusting workplace
- Roll out and/or expand unconscious bias education within our companies in the form that best fits our specific culture and business.
- Commit to helping other companies evolve and enhance their current diversity strategies and encourage them, in turn, to share their successes and challenges with others.