

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking into)
Implementation of Public Utilities Code)
Sections 8281-8285 relating to Women)
Minority - Disabled Veteran)
Business Enterprises)
_____)

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
UTILITY SUPPLIER DIVERSITY PROGRAM REPORT
FOR CALENDAR YEAR 2017**

March 1, 2018

**Liberty Utilities (CalPeco Electric) LLC
2017 Annual Report & 2018 Annual Plan**

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ANNUAL REPORT

This filing, in compliance with the requirements of California Public Utilities Commission (CPUC) General Order 156 Sections 9 and 10 and Decision 88-04-057, as modified by Decision Nos. 88-09-024, 89-08-041, 90-11-053, 90-12-027, 92-06-030, 95-12-045, 96-12-081, 98-11-030, 03-11-024, 05-12-023, 06-08-031, includes the 2017 Annual Report of Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”), and 2018 Annual Plan of Utility Supplier Diversity Program. The annual report describes the program activities and results achieved by Liberty CalPeco for the period January 1 through December 31, 2017.

INTRODUCTION AND EXECUTIVE SUMMARY

Liberty CalPeco is an investor-owned corporation with operating subsidiaries engaged in energy and utility services. The Service Area for which electricity will be served by Liberty CalPeco is serving more than 49,000 customers in the Lake Tahoe basin. Liberty CalPeco supplies electric distribution service in portions of the counties of Nevada, Placer, Sierra, Plumas, Eldorado, Mono, and Alpine in the State of California.

Summary of Results:

Liberty CalPeco spent \$4.9 million with diverse business enterprises. This represents a decrease of \$3.2 million from the amount spent with diverse business in 2016.

Liberty achieved a Diverse Spend of 18.7% with verified diverse business enterprises against the targeted goal of 22.5% in 2017.

Sec. 9.1.1 – Description of Utility Supplier Diversity Program activities engaged in during the previous calendar year. This description shall include both internal and external activities.

Internal Activities

Liberty CalPeco’s Supplier Diversity program is comprised of one employee, Linda Stahl. She is supported by its California President and its Vice President in its Diversity Program initiatives. She is also its Senior Specialist/Procurement which allows her to screen its suppliers to determine their eligibility as a women, minority, disabled veteran, lesbian, gay, bisexual and transgender business enterprise (WMDVLGBTBE) and to encourage those who qualify to become certified.

Working with Liberty Utilities (Park Water & Apple Valley) in Southern California, has introduced new opportunities to its Supplier Diversity Program, which has been positive and well received. As Liberty continues with open communications and attending outreach programs, it continues to excel towards the goals set by GO 156.

External Activities

Liberty CalPeco continues to collaborate to provide opportunities for prime contractors to build relationships that support the Supplier Diversity Program, in reaching program goals. Being involved with the Joint Utility meetings quarterly provides insight to diversity events and builds relationships across the utilities. To expand its diversity program, it recognizes the need to include outreach to non-diverse prime contractors in efforts to grow their participation in supplier diversity by promoting a second-tier program in the future.

2017 WMDVLGBTBE Event Attended - Los Angeles

Some highlights of this event were an in-depth panel discussion on financing options, moderated by an SBA representative. Boston Private Bank and Trust, Bank of America and Pacific Western Bank, provided attendees with valuable insights from small, medium and large lending entities. The Transportation Authority presented “Effective Marketing to Public Utilities”. Local experts discussed how diverse suppliers could identify their ideal customer prior to crafting marketing messages and websites, as well as best practices for writing capabilities statements. The event concluded with a marketing-oriented panel discussion moderated by an executive from a diverse construction company.

**Sec. 9.1.2 – Utility Supplier Diversity Program Annual Results – Statistical Reports
Totals**

Liberty CalPeco		Report for 2017			G.O. #156 Sec. 9.1.2	
WMDVLGBTBE Annual Results by Ethnicity						
		2017				
		Direct	Sub	Total \$	%	
1	Minority Male	Asian Pacific American	\$68,405	\$0	\$68,405	0.26%
2		African American	\$109,349	\$0	\$109,349	0.41%
3		Hispanic American	\$2,555,280	\$0	\$2,555,280	9.59%
4		Native American	\$44,048	\$0	\$44,048	0.00%
5		Total Minority Male	\$2,777,082	\$0	\$2,777,082	10.42%
6	Minority Female	Asian Pacific American	\$0	\$125,539	\$125,539	0.47%
7		African American	\$0	\$0	\$0	0.00%
8		Hispanic American	\$0	\$0	\$0	0.00%
9		Native American	\$0	\$0	\$0	0.00%
10		Total Minority Female	\$0	\$125,539	\$125,539	0.47%
11	Total Minority Business Enterprise (MBE)		\$2,830,282	\$125,539	\$2,955,821	10.62%
12	Women Business Enterprise (WBE)		\$1,995,840	\$0	\$1,995,840	7.49%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		\$0	\$0	\$0	0.00%
14	Disabled Veteran Business Enterprise (DVBE)		\$34,353	\$0	\$34,353	0.13%
15	Other 8(a)*		\$4,202	\$0	\$4,202	0.02%
16	TOTAL WMDVLGBTBE		\$4,864,677	\$125,539	\$4,990,216	18.73%
17	Net Procurement**		\$ 26,644,711.00			
NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE						
** NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS						
Direct - DIRECT PROCUREMENT						
Sub - SUBCONTRACTOR PROCUREMENT						
% - PERCENTAGE OF NET PROCUREMENT						

Sec. 9.1.2 – Utility Supplier Diversity Program Annual Results – Statistical Reports

Direct Spending

Liberty CalPeco		Report for 2017				G.O. #156 Sec. 9.1.2			
WMDVLGBTBE Direct Procurement by Product and Service Categories									
				Products		Services		Total	
				\$	%	\$	%	\$	%
1	Minority Male	Asian Pacific American	Direct	\$10,306	0.04%	\$58,099	0.00%	\$68,405	0.26%
2		African American	Direct	\$0	0.00%	\$109,349	0.41%	\$109,349	0.41%
3		Hispanic American	Direct	\$0	0.00%	\$2,555,280	9.59%	\$2,555,280	9.59%
4		Native American	Direct	\$0	0.00%	\$44,048	0.00%	\$44,048	0.17%
5		Total Minority Male	Direct	\$10,306	0.04%	\$2,766,776	10.00%	\$2,777,082	10.42%
6	Minority Female	Asian Pacific American	Direct	\$0	0.00%	\$0.00	0.00%	\$0	0.00%
7		African American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
8		Hispanic American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
9		Native American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
10		Total Minority Female	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
11	Total Minority Business Enterprise (MBE)		Direct	\$31,459	0.12%	\$2,798,822	10.50%	\$2,830,281	10.62%
12	Women Business Enterprise (WBE)		Direct	\$248,228	0.93%	\$1,747,612	6.56%	\$1,995,840	7.49%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
14	Disabled Veteran Business Enterprise (DVBE)		Direct	\$33,758	0.13%	\$595	0.01%	\$34,353	0.13%
15	Other 8(a)*		Direct	\$4,202	0.00%	\$0	0.00%	\$4,202	0.02%
16	TOTAL WMDVLGBTBE		Direct	\$317,647	1.19%	\$4,547,029	17.07%	\$4,864,676	18.26%
17	Total Product Procurement			\$3,454,162					
18	Total Service Procurement			\$23,190,549					
19	Net Procurement**			\$ 26,644,711.00					
20	Total Number of WMDVLGBTBEs that Received Direct Spend			42					
NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE									
** NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS									
Direct - DIRECT PROCUREMENT									
Sub - SUBCONTRACTOR PROCUREMENT									
% - PERCENTAGE OF NET PROCUREMENT									

**Sec. 9.1.2 – Utility Supplier Diversity Program Annual Results – Statistical Reports
Subcontract Spending**

Liberty CalPeco		Report for 2017				G.O. #156 Sec. 9.1.2			
WMDVLGBTBE Subcontractor Procurement by Product and Service Categories									
				Products		Services		Total	
				\$	%	\$	%	\$	%
1	Minority Male	Asian Pacific American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
2		African American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
3		Hispanic American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
4		Native American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
5		Total Minority Male	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
6	Minority Female	Asian Pacific American	Sub	\$0	0.00%	\$125,539	0.47%	\$125,539	0.47%
7		African American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
8		Hispanic American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
9		Native American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
10		Total Minority Female	Sub	\$0	0.00%	\$125,539	0.47%	\$125,539	0.47%
11	Total Minority Business Enterprise (MBE)		Sub	\$0	0.00%	\$0	0.00%	\$125,539	0.47%
12	Women Business Enterprise (WBE)		Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
14	Disabled Veteran Business Enterprise (DVBE)		Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
15	Other 8(a)*		Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
16	TOTAL WMDVLGBTBE		Sub	\$0	0.00%	\$0	0.00%	\$125,539	0.47%
17	Total Product Procurement							\$3,454,162	
18	Total Service Procurement							\$23,190,549	
19	Net Procurement**							\$26,644,711	
NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE									
** NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS									
Direct - DIRECT PROCUREMENT									
Sub - SUBCONTRACTOR PROCUREMENT									
% - PERCENTAGE OF NET PROCUREMENT									

**Sec. 9.1.2 – Utility Supplier Diversity Program Annual Results – Statistical Reports
Procurement by Standard Industrial Categories**

Liberty CalPeco	Report for 2017	G. O. #156 Sec 9.1.2
WMDVLGBTBE Procurement by Standard Industrial Categories		

SIC Category	Asian Pacific American		African American		Hispanic American		Native American		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	Other 8(a)**	Total WMDVLGBTBE	Total Dollars	
	Male	Female	Male	Female	Male	Female	Male	Female								
07. Agricultural	\$				\$ 2,445,809				\$ 2,445,809					\$ -	\$ 2,445,809	
	%														9.18%	
17. Special Trade Contractors	\$								\$ -					\$ -	\$ -	
	%														0.00%	
28. Chemical & Allied Products	\$								\$ -	\$ 1,629				\$ 1,629	\$ 1,629	
	%														0.01%	
30. Rubber & Misc Plaxtic Products	\$								\$ -					\$ -	\$ -	
	%														0.00%	
32. Stone, Clay & Glass Products	\$								\$ -					\$ -	\$ -	
	%														0.00%	
34. Fabricated Metal Products	\$								\$ -	\$ 1,195				\$ 1,195	\$ 1,195	
	%														0.00%	
35. Industrial Machinery & Equipment	\$								\$ -	\$ 5,550				\$ 5,550	\$ 5,550	
	%														0.02%	
36. Electronic & Other Electric Equipment	\$		\$ 97,349						\$ 129,395	\$ 40,189				\$ 40,189	\$ 169,584	
	%														0.64%	
47. Transportation Services	\$								\$ -	\$ 45,837				\$ 45,837	\$ 45,837	
	%														0.17%	
50. Wholesale Trade - Durable Goods	\$								\$ 2,017	\$ 356,426		\$ 33,758		\$ 390,184	\$ 392,201	
	%														1.47%	
51. Wholesale Trade - Non Durable Goods	\$								\$ -	\$ 115,245				\$ 115,245	\$ 115,245	
	%														0.43%	
62. Sec & Commodity Brokers & Dealers	\$								\$ -					\$ -	\$ -	
	%														0.00%	
73. Business Services	\$	\$ 22,065		\$ 36,335	\$ 5,500		\$ 44,048		\$ 107,948	\$ 295,269		\$ 595		\$ 295,864	\$ 403,812	
	%														1.52%	
95. Environmental Services	\$			\$ 73,014					\$ 73,014	\$ 193,274				\$ 193,274	\$ 266,288	
	%														1.00%	
87. Engineering & Management Services	\$	\$ 46,340	\$ 28,190			\$ 103,970			\$ 197,636	\$ 941,226			\$ 4,202	\$ 945,428	\$ 1,143,064	
	%														4.29%	
TOTAL	\$	\$68,405	\$125,539	\$109,349	\$0	\$2,555,279	\$0	\$44,048	\$0	\$2,955,819	\$1,995,840	\$0	\$34,353	\$4,202	\$2,033,200	\$4,990,214
	%	0.26%	0.47%	0.41%	0.00%	9.59%	0.00%	0.17%	0.00%	11.09%	7.49%	0.00%	0.13%	0.02%	7.63%	18.73%

Total Product Procurement	\$3,454,162
Total Service Procurement	\$23,190,549
Net Procurement***	\$26,644,711

NOTE: FIRMS WITH MULTIT MINORITY OWNERSHP STATUS

**FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE

***NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS

TOTAL DOLLARS - TOTAL PROCUREMENT DOLLAR AMOUNT IN THE SPECIFIC SIC CATEGORY

% - PERCENTAGE OF TOTAL DOLLARS

**Sec. 9.1.2 – Utility Supplier Diversity Program Annual Results – Statistical Reports
Number of WMDVLGBTBE Suppliers and Revenue Reported to the Clearinghouse**

Liberty CalPeco				Report for 2017			G. O. #156 Sec 9.1.2 (D.11-05-019 & D.06-11-028)						
Number of WMDVLGBTBE Suppliers and Revenue Reported to the Clearinghouse													
Data on Number of Suppliers													
Revenue Reported to CHS							Utility-Specific 2016 Summary						
# WMDVLGBTBEs	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total	
Under \$1 million	6	13	0	1	0	20	5	16	0	1	1	23	
Under \$5 million	1					1						0	
Under \$10 million												0	
Above \$10 million												0	
TOTAL	7	13	0	1	0	21	5	16	0	1	1	23	
Revenue and Payment Data													
Revenue Reported to CHS							Utility-Specific 2016 Summary						
WMDVLGBTBE \$M	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total	
Under \$1 million	\$ 176,028	\$ 1,691,347	\$ -	\$ 595		1867970	\$ 208,444	\$ 430,031	\$ -	\$ 33,758	\$ 4,202	676435	
Under \$5 million	\$ 2,445,809					2445809							
Under \$10 million													
Above \$10 million													
TOTAL	\$ 2,621,837	\$ 1,691,347	\$ -	\$ 595	\$ -	\$ 4,313,779	\$ 208,444	\$ 430,031	\$ -	\$ 33,758	\$ 4,202	\$ 676,435	
NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE													
CHS: SUPPLIER CLEARINGHOUSE													

Sec. 9.1.3 – Itemization of Program Expenses

Liberty CalPeco	Report for 2016	G.O. #156 Sec. 9.1.3
WMDVLGBTBE Program Expenses		

Expense Category	Year (Actual)
Wages	\$8,024
Other Employee Expenses	\$4,814
Program Expenses	\$0
Reporting Expenses	\$150
Training	\$0
Consultants	\$0
Other (Clearinghouse)	\$1,685
TOTAL	\$14,673

Sec. 9.1.4 – Description of progress in meeting or exceeding set goals and an explanation of any circumstances that may have caused the utility to fall short of its goals.

Liberty CalPeco’s net procurement decreased from about \$8.1 million in 2016 to \$5 million in 2017. The utility continues to experience some diversity spend constraints due to mainly to its service territory location. Hard winters and difficult road conditions and constraints serve as a deterrent to potential vendors. Because of these circumstances Liberty CalPeco was challenged to replace diversity spend with non-diverse vendors. However, it is pleased to report it achieved 19% diversity spend despite the limitations. Liberty Utilities is currently doing a refresh to look at its spending as a whole to see how to best update its policies and practices. Liberty CalPeco is also analyzing its overall vendor base to grow its diversity dollar spend.

Liberty CalPeco	Report for 2017	G.O. #156 Sec. 9.1.4
Description of Progress in Meeting or Exceeding Set Goals		

	2014	2015	2016	2017
Total Procurement \$	\$ 22,172,440	\$ 21,717,901	\$ 26,508,824	\$ 26,644,711
% change	32%	-2%	22%	1%
Total WMDVBE \$	\$ 6,198,028	\$ 4,860,315	\$ 8,095,632	\$ 4,990,216
% change	49%	-22%	67%	-38%

Liberty CalPeco	Report for 2017	G.O. #156 Sec. 9.1.4
WMDVLGBTBE Results and Goals		

Category	2017 Results	2017 Goals	2018 Goals
Minority Men	10.42%	13.50%	14.00%
Minority Women	0.47%	4.00%	4.50%
Minority Business Enterprise (MBE)	11.11%	17.50%	18.00%
Women Business Enterprise (WBE)	7.49%	4.00%	5.00%
Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	0.00%	1.00%	1.50%
Disabled Veteran Business (DVBE)	0.13%	1.00%	1.50%
TOTAL WMDVLGBTBE	18.73%	22.50%	23.50%

% - PERCENTAGE OF NET PROCUREMENT

Sec. 9.1.5 – A summary of prime contractor utilization of WMDVBE subcontractors.

Liberty CalPeco	Report for 2017	G.O. #156 Sec. 9.1.5
Summary of Prime Contractor Utilization of WMDVLGBTBE Subcontractors		

	Minority Male	Minority Female	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	Other 8(a)*	TOTAL WMDVLGBTBE
Direct \$	\$2,777,082	\$0	\$2,830,281	\$1,995,840	\$0	\$34,353	\$4,202	\$4,864,676
Subcontracting \$	\$0	\$125,539	\$0	\$0	\$0	\$0	\$0	\$125,539
Total \$	\$2,777,082	\$125,539	\$2,830,281	\$1,995,840	\$0	\$34,353	\$4,202	\$4,990,215

Direct %	10.42%	0.00%	10.62%	7.49%	0.00%	0.13%	0.02%	18.26%
Subcontracting %	0.00%	0.47%	0.00%	5.90%	0.00%	0.00%	0.00%	0.47%
Total %	10.42%	0.47%	10.62%	7.49%	0.00%	0.13%	0.02%	18.73%

Net Procurement**	\$26,644,711
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NOTE: *FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE

**NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS

% - PERCENTAGE OF NET PROCUREMENT

Direct - DIRECT PROCUREMENT

Sub - SUBCONTRACTOR PROCUREMENT

Sec. 9.1.6 – List of diverse supplier complaints received during the past year, accompanied by a brief description of the nature of each complaint and its resolution or current status.

Liberty Utilities received no program complaints during 2017.

Sec. 9.1.7 – A summary of purchases and /or contracts for products and services in excluded categories.

Liberty CalPeco's 2017 accounts payable activity totaled approximately \$70.2 million. The majority of our accounts payable activity is concentrated with NV Energy and our purchase power agreement. Our purchase power totaled \$25.5 million (36.3%) of our total accounts payable activity. Purchased power, along with employee expense reimbursements, employee benefits, fleet lease payments, fees and taxes, were not considered applicable in identifying or quantifying our discretionary spend total.

Sec. 9.1.8 – Description of any efforts made to recruit diverse suppliers of products or services in procurement categories where diverse supplier utilization has been low, such as legal and financial services, fuel procurement, and areas that are considered highly technical in nature.

Liberty CalPeco will continue efforts to increase opportunities in the categories of Professional Services, Legal, Finance and Information Technology. Together with the

CPUC Workshops and outreach events, it strives to reduce the gap in these categories within its Diversity Program.

Sec. 9.1.9 – Justification for continued existence of any “excluded category”.

Liberty continues to strive to achieve relationships across all categories.

Sec 9.1.11– General Fuel Procurement

Liberty CalPeco’s fuel procurement data with respect to diverse suppliers is currently being evaluated.

Sec. 10.1.2 – Description of Utility Supplier Diversity Program planned for the next calendar year, internal/external program activities.

Program activities in 2018 for Liberty CalPeco will include more activities and outreach events. It will educate staff of new changes that arise within the Supplier Diversity Program, while continued efforts to execute program activities through outreach, internal meetings, executive engagement, goal setting, peer collaboration, external workshops and matchmaking events.

Sec. 10.1.3 – Plans for recruiting diverse suppliers of products or services where diverse supplier utilization has been low or were listed as excluded, such as legal and financial services, fuel procurement, areas considered highly technical in nature, and sole sourcing (transformers, cable/wire).

Liberty Utilities has reviewed its need of attendance to activities to allow increased opportunities for diverse vendors in low utilization areas. Determining eligibility of current vendors that are not certified and exploring program growth through internal and external events.

Sec. 10.1.4 – Plans for recruiting Diverse Vendors Where Unavailable.

Liberty Utilities will seek to find those vendors that are unaware of the opportunities that the Supplier Diversity Program can present.

Sec. 10.1.5 – Plans for encouraging both prime contractors and grantees to engage diverse suppliers in all categories which provide subcontracting opportunities.

Liberty CalPeco will attend events for prime contractors to build relationships in order to support business growth and meet overall diversity goals.

Sec. 10.1.6 – Plans for complying with the Utility Supplier Diversity Program established by the Commission as required by Public Utilities Sections 8283 (c). The Executive Director’s Office will be responsible for developing, periodically refining, and recommending such guidelines for the Commission’s adoption.

Liberty CalPeco will continue to comply with General Order 156 and its guidelines and requirements as well as continue to work with the Commission and its staff and the California Joint Utilities Group in pursuing new strategies to continually advance the Utility Supplier Diversity Program objectives. Liberty will comply with all revisions of General Order 156 and all other requirements of the CPUC.