

March 1, 2016

Via E-Mail (timothy.sullivan@cpuc.ca.gov)

Timothy Sullivan
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: General Order 156 Compliance

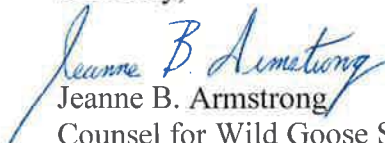
Dear Mr. Sullivan:

In accord with Sections 9 and 10 of General Order 156, Wild Goose Storage, LLC (“Wild Goose”), an independent gas storage company, hereby serves its 2015 Annual Report and Plan on the Utilization of Women, Minority and Disabled Business Enterprises (“WMDVBE”).

Wild Goose’s 2015 Report reflects a percentage decrease in WMDVBE spend. This decrease is primarily reflective of the fact that a major capital maintenance project was performed at Wild Goose’s storage facility in 2015. This maintenance project increased the company’s overall spend above that which can be expected in a typical year. However, given the highly specialized nature of the services needed to perform the required maintenance, Wild Goose was unable to locate a WMDVBE vendor with the necessary specialization to perform the needed work. In addition, Wild Goose, as a result of decreased compressor use at its storage facility, reduced the amount of its oil purchases. Wild Goose’s oil supplier is a WMDVBE certified company and has consistently been a major spend category for Wild Goose’s WMDVE program. Working in concert, these two deviations from Wild Goose’s typical annual procurement spend resulted in a decrease in WMDVBE spend in comparison to overall spend. Wild Goose, however, continues to be diligent in its efforts to use WMDVBE vendors for its procurement needs whenever feasible.

Please contact me at the number listed below if you should have any questions on the report.

Sincerely,



Jeanne B. Armstrong
Counsel for Wild Goose Storage, LLC

cc: Stephanie Green (stephanie.green@cpuc.ca.gov)
Drisha Melton (drisha.melton@cpuc.ca.gov)

Enclosures

WILD GOOSE STORAGE, LLC	2015	G.O. #156
WMDVBE ANNUAL REPORT/ANNUAL PLAN - TABLE OF CONTENTS		

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WILD GOOSE STORAGE, LLC	2015	G.O. #156 Sec. 9.1.1
A description of WMDVBE Capacity Building		

Internal Program Activities

In the area of Capacity Building, Wild Goose, as a small utility has only so much leverage to be able to affect change in this area. The specialized nature of some of the equipment as well as the processes unique to Gas Storage make it difficult in some instances to be able to spread out the supplier base. When undertaking large development / capital projects at Wild Goose, it typically necessitates the use of high capacity equipment, and unique technical skills and contractor labor. Goods and services that aren't readily available from WMDVBE companies. The proprietary nature of our business definitely limits our ability to be more aggressive in this area. That being said, Wild Goose continues to investigate WMDVBE companies in the area to see if they'd be a possible fit for future use. Calendar Year 2015 encountered one significant capital project, which required the utilization of specialized technical services purchases / equipment, which in turn prevented the use of WMDVBE companies, and caused the overall WMDVBE percentage to be lower than 2014.



WILD GOOSE STORAGE, LLC	2015	G.O. #156 Sec. 9.1.1
A description of WMDVBE program activities engaged in during the previous calendar year.		

Internal Program Activities

Wild Goose's Supplier Diversity program is administered jointly by the Manager of Engineering and Operations (E&O), U.S. Operations personnel, and Technical Assistant for the E&O group. The Head Office in Calgary eliminated the Procurement Coordinator position in early 2014. The facility has been fully committed to the development and adherence to the goals of the Supplier Diversity Program. The Manager of E&O has reviewed the Clearinghouse information in regards to utilization of minority spend.

External Program Activities

[Redacted content]

Internal Program Activities

Wild Goose runs the Supplier Diversity Program jointly between the Calgary Head Office and the facility. The ability for Wild Goose to expand its mandate in this area requires both local and Head Office support. We have been focusing our resources upon doing what we can to expand the supplier base in the Wild Goose area as well as increasing business ties with the small and relatively non-diverse business community. We are aware that this is a worthy goal and will strive to make progress in this area with the resources that we have at our disposal.

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 9.1.2
WMDVBE ANNUAL RESULTS BY ETHNICITY		

Line No.			Direct \$	Sub \$	Direct + Sub \$	% of company's total procurement
1	Minority Men	Asian-Pacific			\$0	0.00%
2		Black			\$0	0.00%
3		Hispanic	\$86,735		\$86,735	4.24%
4		Native-American			\$0	0.00%
5		Other			\$0	0.00%
6		Total Minority Men	\$86,735	\$0	\$86,735	4.24%
7	Minority Women	Asian Pacific			\$0	0.00%
8		Black			\$0	0.00%
9		Hispanic			\$0	0.00%
10		Native-American			\$0	0.00%
11		Other			\$0	0.00%
12		Total Minority Women	\$0	\$0	\$0	0.00%
13	Total Minority Business Enterprise (MBE)		\$86,735	\$0	\$86,735	4.24%
14	Women Business Enterprise (WBE)		\$37,363		\$37,363	1.83%
15	Total Women, Minority Business Enterprise (MWBE)		\$124,098	\$0	\$124,098	6.07%
16	Service Disabled Veteran Business Enterprise (DVBE)		\$0	\$0	\$0	0.00%
17	TOTAL WMDVBE		\$124,098	\$0	\$124,098	6.07%
18	Gross Procurement			\$5,413,129		
19	Exclusions			\$3,368,151		
20	Net Procurement			\$2,044,978		

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 9.1.2
WMDVBE PROCUREMENT BY PRODUCT AND SERVICE CATEGORIES		

Line No.				Products		Services		TOTAL	
				\$	%	\$	%	\$	%
1	Minority Men	Asian-Pacific	Direct		0.00%		0.00%	\$0	0.00%
2		Black	Direct		0.00%		0.00%	\$0	0.00%
3		Hispanic	Direct	\$86,735	12.55%		0.00%	\$86,735	4.24%
4		Native-American	Direct		0.00%		0.00%	\$0	0.00%
5		Other	Direct		0.00%		0.00%	\$0	0.00%
6		Total Minority Men	Direct	\$86,735	12.55%	\$0	0.00%	\$86,735	4.24%
7	Minority Women	Asian Pacific	Direct		0.00%		0.00%	\$0	0.00%
8		Black	Direct		0.00%		0.00%	\$0	0.00%
9		Hispanic	Direct		0.00%		0.00%	\$0	0.00%
10		Native-American	Direct		0.00%		0.00%	\$0	0.00%
11		Other	Direct		0.00%		0.00%	\$0	0.00%
12		Total Minority Women	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
13	Total Minority Business Enterprise (MBE)		Direct	\$86,735	12.55%	\$0	0.00%	\$86,735	4.24%
14	Women Business Enterprise (WBE)		Direct	\$5,576	0.81%	\$31,787	2.35%	\$37,363	1.83%
15	Subtotal Women, Minority Business Enterprise (MWBE)		Direct	\$92,311	13.36%	\$31,787	2.35%	\$124,098	6.07%
16	Service Disabled Veteran Business Enterprise (DVBE)		Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
17	TOTAL WMDVBE		Direct	\$92,311	13.36%	\$31,787	2.35%	\$124,098	6.07%
18	Gross Procurement			\$5,413,129					
19	Exclusions			\$3,368,151					
20	Net Procurement			\$2,044,978					
21	Total Product Procurement			\$691,025					
22	Total Service Procurement			\$1,353,953					
23	Net Procurement			\$2,044,978					

Percentages for "Products" expenditures are WMDVBE expenditures compared to "Total Product Procurement" expenditures.
Percentages for "Services" expenditures are WMDVBE expenditures compared to "Total Service Procurement" expenditures.
Percentages for "TOTAL" expenditures are WMDVBE expenditures compared to "Net Procurement" expenditures.

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 9.1.2
WMDVBE PROCUREMENT BY PRODUCT AND SERVICE CATEGORIES		

Line No.				Products		Services		TOTAL	
				\$	%	\$	%	\$	%
1	Minority Men	Asian-Pacific	sub		0.00%		0.00%	\$0	0.00%
2		Black	sub		0.00%		0.00%	\$0	0.00%
3		Hispanic	sub		0.00%		0.00%	\$0	0.00%
4		Native-American	sub		0.00%		0.00%	\$0	0.00%
5		Other	sub		0.00%		0.00%	\$0	0.00%
6		Total Minority Men	sub		\$0	0.00%	\$0	0.00%	\$0
7	Minority Women	Asian Pacific	sub		0.00%		0.00%	\$0	0.00%
8		Black	sub		0.00%		0.00%	\$0	0.00%
9		Hispanic	sub		0.00%		0.00%	\$0	0.00%
10		Native-American	sub		0.00%		0.00%	\$0	0.00%
11		Other	sub		0.00%		0.00%	\$0	0.00%
12		Total Minority Women	sub		\$0	0.00%	\$0	0.00%	\$0
13	Total Minority Business Enterprise (MBE)		sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
14	Women Business Enterprise (WBE)		sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
15	Subtotal Women, Minority Business Enterprise (MWBE)		sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
16	Service Disabled Veteran Business Enterprise (DVBE)		sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
17	TOTAL WMDVBE		sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
18	Gross Procurement			\$5,413,129					
19	Exclusions			\$3,368,151					
20	Net Procurement			\$2,044,978					
21	Total Product Procurement			\$691,025					
22	Total Service Procurement			\$1,353,953					
23	Net Procurement			\$2,044,978					

Percentages for "Products" expenditures are WMDVBE expenditures compared to "Total Product Procurement" expenditures.
 Percentages for "Services" expenditures are WMDVBE expenditures compared to "Total Service Procurement" expenditures.
 Percentages for "TOTAL" expenditures are WMDVBE expenditures compared to "Net Procurement" expenditures.

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 9.1.2
PROCUREMENT BY SIC CODE		

Line No.	Description	SIC CODE	Products		Services	
			\$	%	\$	%
1	Agricultural Services	7	\$0	0.00%	\$0	0.00%
2	Oil & Gas Extraction	13	\$0	0.00%	\$82,000	6.06%
3	General Building Contractors	15	\$0	0.00%	\$0	0.00%
4	Heavy Construction Contractors	16	\$0	0.00%	\$47,733	3.53%
5	Special Trade Contractors	17	\$0	0.00%	\$226,062	16.70%
6	Paper and Allied Products	26	\$6,111	0.88%	\$0	0.00%
7	Chemicals and Allied Products	28	\$16,877	2.44%	\$0	0.00%
8	Fabricated Metal Products	34	\$30,070	4.35%	\$0	0.00%
9	Industrial Machinery and Equipment	35	\$433,661	62.76%	\$0	0.00%
10	Electrical and Electronic Equipment	36	\$58,435	8.46%	\$0	0.00%
11	Instruments and Related Products	38	\$50,606	7.32%	\$0	0.00%
12	Miscellaneous Manufacturing Industries	39	\$0	0.00%	\$0	0.00%
13	Transportation Services	47	\$0	0.00%	\$0	0.00%
14	Communications	48	\$0	0.00%	\$2,075	0.15%
15	Electric, Gas and Sanitary Services	49	\$0	0.00%	\$5,019	0.37%
16	Wholesale Trade - Durable Goods	50	\$8,365	1.21%	\$0	0.00%
17	Wholesale Trade - Non-durable Goods	51	\$86,900	12.58%	\$0	0.00%
18	Apparel and Accessory Stores	56	\$0	0.00%	\$10,343	0.76%
19	Miscellaneous Retail	59	\$0	0.00%	\$0	0.00%
20	Insurance Agents, Brokers and Service	64	\$0	0.00%	\$51,954	3.84%
21	Business Services	73	\$0	0.00%	\$819,318	60.51%
22	Automotive Repair, Services & Parking	75	\$0	0.00%	\$43,986	3.25%
23	Health Services	80	\$0	0.00%	\$255	0.02%
24	Legal Services	81	\$0	0.00%	\$2,100	0.16%
25	Educational Services	82	\$0	0.00%	\$925	0.07%
26	Engineering and Management Services	87	\$0	0.00%	\$62,183	4.59%

27	Gross Procurement	\$5,413,129
28	Exclusions	\$3,368,151
29	Net Procurement	\$2,044,978

30	Total Product Procurement	\$691,025
31	Total Service Procurement	\$1,353,953
32	Net Procurement	\$2,044,978

WMDVBE PROCUREMENT BY PRODUCT AND SERVICE CATEGORIES - DETAIL

Line No.	Products or Service		Asian		Black		Hispanic		Native-Amer.		Other		Total Minority Men	Total Minority Women	Subtotal Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Subtotal Women, Minority Business Enterprise (WMBE)	Service Disabled Veterans Business Enterprise (DVBE)	Total WMDVBE	Total Expenditures
			Men	Women	Men	Women	Men	Women	Men	Women	Men	Women								
1	50	\$	0	0	0	0	0	0	0	0	0	0	0	0	5,576	5,576	0	5,576	\$8,365	
2		%										0.00%	0.00%	0.00%	66.66%	66.66%	0.00%	66.66%		
3	51	\$	0	0	0	0	86,735	0	0	0	0	86,735	0	86,735	0	86,735	0	86,735	\$86,900	
4		%										99.81%	0.00%	99.81%	0.00%	99.81%	0.00%	99.81%		
5	87	\$	0	0	0	0	0	0	0	0	0	0	0	0	31,787	31,787	0	31,787	\$62,183	
6		%										0.00%	0.00%	0.00%	51.12%	51.12%	0.00%	51.12%		
7		\$	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0	
8		%										#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!		
9	Total	\$	0	0	0	0	86,735	0	0	0	0	86,735	0	86,735	37,363	124,098	0	124,098	157,448	
10		%	0.00%	0.00%	0.00%	0.00%	55.09%	0.00%	0.00%	0.00%	0.00%	55.09%	0.00%	55.09%	23.73%	78.82%	0.00%	78.82%		

11	Gross Procurement	\$5,413,129
12	Exclusions	\$3,368,151
13	Net Procurement	\$2,044,978
14	Total Procurement	\$2,044,978

Percentages are WMDVBE expenditures compared to total expenditures for each product category.

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 9.1.3
WMDVBE PROGRAM EXPENSES		

Line No.	Expense Category	(Actual \$)
1	Wages	6,500
2	Other Employee Expenses	0
3	Program Expenses	0
4	Reporting Expenses	0
5	Training	0
6	Consultants	1,500
7	Other	0
8	TOTAL	8,000

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 9.1.4
A 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.		

Line
No
1
2
3
4
5
6
7
8

Category	Current Year Results	Current Year Goals
Minority Men	4.24%	4.00%
Minority Women	0.00%	2.00%
Minority Business Enterprise (MBE)	4.24%	6.00%
Women Business Enterprise (WBE)	1.83%	2.00%
Service Disabled Veteran Business Enterprise (DVBE)	0.00%	1.00%
Total WMDVBE	6.07%	9.00%

Other Multi Status

Grand Total	6.07%
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The reason for Wild Goose's shortfall in meeting WMDVBE goals during 2015 was two fold (1) with Operations spend, the group made less purchases this year for consumables, such as engine/compressor oil, due to less demand for gas storage use by customers during 2015. Other fixed operating costs remained the same, which in turn resulted in an overall drop in WMDVBE percent use. (2) A \$900K capital project was performed, which was above the typical amount spent for maintenance capital. This specific project required the use of specialized services and products which prevented the use of WMDVBE companies. Wild Goose expects maintenance capital spending to return to normal level in 2016, which should have positive impact on WMDVBE % spend for the upcoming year.

Line No.		Minority Men	Minority Women	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Women, Minority Business Enterprise (WMBE)	Service Disabled Veterans Business Enterprise (DVBE)	TOTAL WMDVBE
1	Direct \$			0		0	0	0
2	Subcontracting \$			0		0	0	0
3	Total \$	0	0	0	0	0	0	0
4								
5	Direct %	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
6	Subcontracting %	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
7	Total %	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
8								
9	Gross Procurement							
10	Exclusion							
11	Net Procurement		0.00					
12								
13								
14	Total %		#DIV/0!					



WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 9.1.6
A list of WMDVBE complaints received during the past year, accompanied by a brief description of the nature of each complaint and its resolution or current status		

Wild Goose has received no complaints with respect to Supplier Diversity during the 2015 calendar year.

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 9.1.8
A description of any efforts made to recruit WMDVBE suppliers of products or services in procurement categories where WMDVBE utilization has been low, such as legal and financial services, fuel procurement, and areas that are considered highly technical in nature.		

Wild Goose recognizes the fact that there are a number of procurement categories where utilization of Supplier Diversity vendors has been historically low. As Wild Goose's program implementation progresses, we will continue use our best efforts to identify vendors in these low-use areas and include them in our procurement efforts.

Line No.			Short-Term (200-)				Mid-Term (200-)				Long-Term (200-)						
			Minority		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Women, Minority Business Enterprise (WBE)	Minority		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Women, Minority Business Enterprise (WBE)	Minority		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Women, Minority Business Enterprise (WBE)
			Men	Women				Men	Women				Men	Women			
1	Products																
2	51 - Wholesale non durable products	%	5.00%		5.00%		5.00%	6.00%		6.00%		6.00%	7.00%		7.00%		7.00%
3	Category 2	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
4	Category 3	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
5	Category 4	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
6	Category 5	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
7	Category 6	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
8	Category 7	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
9	Category 8	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
10	Category 9	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
11	Category 10	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
12	Subtotal	%	5.00%	0.00%	5.00%	0.00%	5.00%	6.00%	0.00%	6.00%	0.00%	6.00%	7.00%	0.00%	7.00%	0.00%	7.00%

Line No.			Short-Term (200-)				Mid-Term (200-)				Long-Term (200-)						
			Minority		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Women, Minority Business Enterprise (WBE)	Minority		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Women, Minority Business Enterprise (WBE)	Minority		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Women, Minority Business Enterprise (WBE)
			Men	Women				Men	Women				Men	Women			
13	Services																
14	87 - Engineering	%			0.00%	4.00%	4.00%			0.00%	4.50%	4.50%			0.00%	5.00%	5.00%
15	Category 2	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
16	Category 3	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
17	Category 4	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
18	Category 5	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
19	Category 6	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
20	Category 7	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
21	Category 8	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
22	Category 9	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
23	Category 10	%			0.00%		0.00%			0.00%		0.00%			0.00%		0.00%
24	Subtotal	%	0.00%	0.00%	0.00%	4.00%	4.00%	0.00%	0.00%	0.00%	4.50%	4.50%	0.00%	0.00%	0.00%	5.00%	5.00%

25 TOTAL		5.00%	0.00%	5.00%	4.00%	9.00%	6.00%	0.00%	6.00%	4.50%	10.50%	7.00%	0.00%	7.00%	5.00%	12.00%
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SDV						1.00%					1.50%					2.00%
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WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 10.1.2
A description of WMDVBE program planned for the next calendar year.		

Internal program activities

Wild Goose has only one operating facility in California; the main storage site in Butte County. Procurement activities are extremely limited there. As the needs of the facility continue to move more towards operating as opposed to expansion, the required nature of goods will also change and allow for greater WMDVBE percent use. The gas storage market tends to be volatile, and thus WMDVBE spending will also be based on customer demand for gas storage use. Due to the limited number of purchases that are made, the employment of a full time procurement specialist is not justified. The Manager, Engineering U.S. and Technical Assistant, in conjunction with the Plant Production Coordinator will continue to work on due diligence as far as making the local supply network aware of various materials and service opportunities.

External program activities

Wild Goose will acquire and continue its membership in Supplier Diversity trade associations in the Sacramento Valley area, such as the Sacramento Regional Business Partnership and the Sacramento Hispanic, Asian and Black Chambers of Commerce. The Wild Goose facility will continue in its efforts to support programs of diversity.

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 10.1.3
Plans for recruiting WMDVBE suppliers of products or services where WMDVBE utilization has been low, such as legal and financial services, fuel procurement, and areas that are considered highly technical in nature.		

Wild Goose will monitor expenditures in the subject categories where utilization of diverse suppliers' has been historically low. We will continue to monitor accounting reports in order to identify the magnitude of expenditures in these areas and determine if our efforts may have a tangible impact. Although we hope to take advantage of opportunities in these areas, it is our intent to focus our supplier diversity efforts where we can maximize our expenditures with verified suppliers regardless of category.

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 10.1.5
Plans for encouraging both prime contractors and grantees to engage WMDVBEs in subcontracts in all categories which provide subcontracting opportunities.		

Wild Goose has supplied prime contractors with pamphlets provided by Supplier Clearinghouse and with a copy of GO156. Wild Goose will encourage its prime suppliers and contractors to contact the Office of Small and Minority Business for a list of certified Disabled Veterans not currently verified by the Clearinghouse. The program administrator will continue to assist plant personnel that have procurement authority to encourage prime contractors to include verified minority suppliers.

WILD GOOSE STORAGE LLC	2015	G.O. #156 Sec. 10.1.6
Plans for complying with WMDVBE program guidelines		

Wild Goose senior management is fully committed to supporting the company's Supplier Diversity Program. The company will strive to comply with the provisions and requirements of GO156 and will work with the CPUC in the ongoing implementation of program goals and objectives.