

**SAG Equity Subcommittee**  
**Feedback Received Friday, September 22, 2023**

**Email Received from Briana Moore, Will County Land Use Department:**

In response to SAG's request for feedback on Illinois utilities' Market Development Initiatives (MDIs), I am submitting comments on behalf of the LIEEAC IQ-N Leadership Team. We are particularly addressing the MDIs from utilities in northern Illinois (ComEd, Nicor Gas, Peoples Gas/North Shore Gas). We affirm the aspects of the MDIs that include the principles below and encourage the incorporation of the remaining principles not addressed.

- **Providing access to capital:** As addressed in the MDIs, lack of access to financial resources can be a major hurdle for small and diverse businesses. Ensuring that minority contractors have this access through loans, grants, or investment programs specifically tailored to their needs is highly important. This would require utilities to keep up to date on and regularly inform businesses about these programs.
- **Joining financial support with scaling and sustaining capabilities:** It would be great for the MDIs to include more specific language on program development similar to the [federal Small Business Administration's 8\(a\) Business Development program](#), which was created to support small, disadvantaged businesses by offering one-on-one assistance from dedicated specialists, mentorship opportunities with experienced larger organizations, and room to increase capacity through joint ventures with established businesses. Additional focus on helping smaller businesses learn how to scale and sustain their operations in competitive markets once they receive financial resources would help.
- **Assigning diverse businesses as prime:** In an agreement with a utility, we recommend the diverse business be the "prime" partner and other businesses party to the agreement report to them, even if the other businesses are providing technical or other support, so that the diverse business controls the course of the work and has the primary relationship with the utility. This would make it less likely that the diverse business shares its connections and expertise with larger partners before finding itself shut out of the conversation.
- **Seeking and incorporating feedback from minority contractors and customers:** Creating systems to receive and incorporate feedback from minority contractors about their needs and the MDIs' effectiveness in meeting those needs would ensure the program continually improves. Establishing landing pages and other platforms for contractors to connect with the utilities certainly helps, but additionally conducting direct outreach through surveys or other means would be more proactive.
  - Similarly, utilities should seek input on the MDI initiatives from customers in disadvantaged communities to understand their response to the use of minority contractors.
  - Developing solid relationships with community-based organizations (CBOs), as the MDIs state, is critical to program success. Reaching out directly and regularly to partnering CBOs, listening carefully to any concerns they may have about the program, and taking tangible steps to improve the program for them based on that feedback would foster more trust between the utilities and the CBOs serving as community navigators for them.
  - It would be great to learn more about how the utilities plan to document the feedback they receive, from whom they are receiving feedback, and the measures the utilities have taken or plan to take to address the feedback. If this documentation can be made public, doing so would demonstrate further interest in developing beneficial relationships with these organizations and communities.

- **Creating performance metrics and accountability:** The MDIs rightly touched upon performance metrics. Establishing clear performance metrics in collaboration with minority contractors and CBOs and tracking the initiative's progress along those lines strengthens the program. Agreeing upon specific accountability measures would also help.