

Your supplier report is public record. Make it defensible.

Regulated utilities in 11 mandate states file annual supplier reports with their state commissions: CA GO 156, NY PSC, TX HUB, IL ICC, OH PUCO, VA SCC, WA UTC among them. The filing is public, commissioners read it, and intervenors cite it. This guide covers what commissions expect, where filings get challenged, and how utilities use subcontractor reporting (known in supplier diversity as Tier 2 Reporting) to file numbers that hold up.

WHAT THE OBLIGATION REQUIRES

- Annual supplier reporting to the state commission is mandatory in 11 states, each with its own format and categories.
- Commissions increasingly ask utilities to demonstrate local economic contribution, not just spend percentages.
- Reported certifications must be verifiable; a challenged number in a public filing is a regulatory relations problem, not a data problem.
- Subcontractor-level (Tier 2) spend is how utilities show program depth beyond direct suppliers.

KEY DATES

March 1 (California)	CPUC GO 156 annual supplier diversity report, covering the prior calendar year. GO 156 reporting explicitly includes subcontractor procurement alongside direct spend.
April 15 (Illinois)	ICC annual supplier diversity report under 220 ILCS 5/5-117 for gas, electric, and water utilities with 100,000+ customers.
Annual (NY, TX, and other mandate states)	Each commission sets its own schedule and format. Confirm your state's date and count back 60 days for standard onboarding.

"Having that support from the C-Suite enabled us to really grow the program significantly over the last 10 years."



Joan Kerr, Director of Supply Chain Responsibility



spend from 2% to 10% on the platform

HOW SUPPLIER.IO HANDLES YOUR SUBCONTRACTOR REPORTING

1 Collect

Supplier.io Tier 2 Reporting sends automated data requests to your prime suppliers every time a reporting period opens. Submissions come through a standardized portal that takes most primes about ten minutes. With Managed Services, human follow-up by email and phone keeps participation strong. Your team reviews results instead of chasing spreadsheets.

2 Verify

Integration with the Supplier.io database automatically verifies the certifications for every supplier your primes report by name, checked against 20M+ suppliers sourced from 450+ authoritative sources. Expired or unmatched certifications are flagged. For primes that report by category rather than by name, Managed Services can run certification checks as a custom Data Enrichment project. Collected data becomes defensible data.

3 File

Tier 2 Reporting produces state commission formatted output from the maintained record, in each state's categories, ready for the annual filing and the questions that follow it.

BEYOND THE FILING

The filing is the floor. The same verified subcontractor dataset that Tier 2 Reporting maintains does two more things for you.

Where does your money go after your primes?

Storm response and grid work run through a contractor base your continuity depends on. Tier 2 shows you how your subcontractor spend is distributed across that base, visibility your ERP cannot give you, before dependency becomes an outage-season problem.

Turn spend into impact

Subcontractor spend captured through Tier 2 feeds Economic Impact Analysis, converting verified spend into local jobs, wages, and tax contribution. For regulated utilities, that full supply chain figure is the rate case and commission story: community investment documented from the entire supply chain, not just direct spend.

The defensibility self-check

1. Can you produce the verification source for every certification in your last commission filing?
2. If an intervenor challenged a number in your filing, is your documentation trail hours away or weeks?
3. Does your filing show local and small business contribution, or only diversity percentages?
4. How many follow-ups did your last supplier data collection take, and who sent them?
5. Could you answer a commissioner's question about subcontractor-level spend today?

A maintained record changes the math: prep in days instead of weeks, submissions up to 2x the industry average, and numbers you can defend.

Teams that maintain Tier 2 reporting are 2x+ more likely to expect increased budget and 10x+ more likely to expect enhanced executive support in 2026.

Source: State of Supplier Diversity survey, 225+ program leaders.

Supplier.io is the leading data and SaaS provider for responsible sourcing, with the largest supplier intelligence database: 20M+ suppliers, 820M+ data insights, and over \$12 trillion in spend history behind every verification.