JUSTIFICATION AND APPROVAL
FOR OTHER THAN FULL AND OPEN COMPETITION

1. **Contracting Agency:** US Army Engineer District, Corps of Engineers, PO Box 59, Louisville, KY 40201-0059.

2. **Description of Action:** This justification and approval (J&A) is being prepared for a specific contractor (Mid-American Natural Gas Utility) to perform installation of a new natural service consisting of gas metering and pressure reducing station for the Energy Resilience and Conservation Investment Program (ERCIP) Power Generation and Microgrid project at Rock Island Arsenal (RIA), Illinois. The Government will not purchase the new natural gas service directly but will include as a requirement in the design and Price Breakout Schedule in the solicitation to utilize Mid-American to complete the work. This solicitation will result in a firm fixed price construction contract. The construction contract is planned to be awarded under a DBB – using FY25 MILCON funding.

3. **Description of the Supplies/Service:** Provide the installation of a new natural-gas service, which will include a natural gas meter, pressure reducer and a bypass loop. The Arsenal uses Mid-American as the sole natural gas supplier to the Arsenal. The new service is required to be installed by Mid-American, per their standards. The new natural gas service equipment is non-proprietary but consistent with their standard metered service requirements. Since Mid-American is the sole provider of natural gas to the Arsenal, this is the only option. The overall cost is expected to be approximately [redacted]

4. **Authority Cited:** The statutory authority permitting acquisition of the requirement by Other than Full and Open Competition is 10 U.S.C. 3204(a)(1) as implemented by Revolutionary Federal Acquisition Regulation (FAR) Overhaul (RFO) 6.103-1 (DEV 2026-O00017), Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.

5. **Reason for Authority Cited:**

   (a) Background: This contract for the construction of the ERCIP Power Generation and Microgrid at Rock Island Arsenal is a MILCON project to install 14MW of natural gas generation, 3MW of solar generation, 400kW of Battery Storage, and connection to the existing Hydropower plant at the RIA installation located in Rock Island, Illinois. This project will construct and commission (7) new NG Gensets, approximately 8000 solar panels, a stand-alone Battery Energy Storage system (BESS) and a new switchgear building. The new Microgrid switchgear will contain approximately 22 medium-voltage main, feed, and tie circuit breakers. This switchgear will generate deliver generated power to the Arsenal during normal operation, partial outages and complete loss of primary feeders.

   (b) Justification: The Installation requires a new natural gas service to support the (7) new 2MW natural gas generators. Mid-American is the sole natural gas supplier for the Arsenal.

(c) Impact: If the J&A is not approved it will result in the project being non-functional.

6. **Efforts to Obtain Competition:** A Notice of Intent (NOI) has not been posted to SAM.gov.

7. **Market Research:** Market research was not performed for this work as Mid-American is the sole utility provider of Natural Gas to Rock Island Arsenal.

8. **Interested Sources:** The justification shall be posted with the solicitation, redacted as necessary.

9. **Technical Certification:** I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

[redacted]

10. Requirements Certification: I hereby determine that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

[redacted]

11. **Legal Review and Concurrence:** I hereby determine that the information herein is legally sufficient, and I concur with the sole source procurement.

[redacted]

12. **Fair and Reasonable Cost Determination/Contracting Officer Certification:** I hereby determine that the anticipated cost to the Government for this contract action will be fair and reasonable based on previous work performed by Mid-American utility on the Arsenal. The cost of the service is approximately [redacted]. Therefore, there is only one available supplier that meets the requirements of the solicitation. I further certify that this justification is accurate and complete to the best of my knowledge and belief.

[redacted]