[redacted]

Control No. 25-0016

Justification and Approval (J&A)
For Other than Full and Open Competition

1. Requiring Activity: US Army Corps of Engineers (USACE) Walla Walla District, Little Goose Lock and Dam, 1001 Little Goose Dam Road, Dayton, WA 99328.

2. Contracting Activity: US Army Corps of Engineers (USACE), Walla Walla District (CECT-NWW), 201 North Third Avenue, Walla Walla, WA 99362-1876.

3. Description Of Action: The U.S. Army Corps of Engineers, Walla Walla District, is requesting approval for a new firm fixed-price supply contract. The Government will not purchase the brand name supplies directly, but rather will include the brand name requirement in a larger competitive solicitation leading to a new firm fixed-price contract. The brand name portion of the requirement is intended to be procured via solicitation W912EF25RA003 from Hitachi using Bonneville Power Administration (BPA) funds.

4. Description Of Supplies: CECT-NWW is procuring Spare Transformers for the Lower Snake River (LSR) hydroelectric powerhouses and will require Hitachi brand bushings be installed on the spare transformers that are being procured. The Government will not purchase the bushings directly, but rather will include the brand name requirement in a larger competitive solicitation leading to a new fixed-price contract. The estimated cost of the portion of the contract requiring brand name products is $ 1,691,335.30, as listed below and the overall cost of the transformer contract is estimated at $40 Million:

ITEM	Unit Price	TOTAL COST
Hitachi Type O+ C T550W2000VV - 550 kV High-Voltage Bushings (Qty. 5) for T1 and T2 Transformers	[redacted]	[redacted]
Hitachi Type O+ C T025W0412AT - 25 kV High-Voltage Neutral Bushing (Qty. 5) for T1 and T2 Transformers	[redacted]	[redacted]
Hitachi Type RJ T025B1000DS 25 kV Low-Voltage Bushing (Qty. 12) for T1 Transformers	[redacted]	[redacted]
Hitachi Type RJ T025B0750EC 25 kV Low-Voltage Bushing (Qty. 8) for T2 Transformers	[redacted]	[redacted]
TOTAL		[redacted]

5. Authority Cited:

10 United States Code (U.S.C.) §3204 (a)(1), as implemented in Federal Acquisition Regulation (FAR) 6.302-1(a)(2): Only one responsible source and no other supplies or services will satisfy agency requirements.

6. Reason For Authority Cited:

a. Background: Three Lower Snake River (LSR) Projects, Lower Monumental, Little Goose, and Lower Granite Dams presently have six Westinghouse (now owned by Hitachi) Generator Step Up (GSU) transformer Banks designated T1 and T2. Each T1 transformer bank is comprised of three 164MVA (Megavolt-Amperes)/218.666MVA single-phase transformers and each T2 transformer bank consists of three 82/109.334MVA single-phase transformers. The LSR Projects utilize these GSU transformer banks to transmit 3-phase power to the BPA's

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switchyards and power grid. The spare T1 and T2 transformer supply contract will supply three Spare T1 and two T2 transformers for the T1 and T2 banks at the LSR Projects. As part of this solicitation, each of the spare transformers will be supplied with Hitachi Bushings so that they will fit up with the existing electrical bus duct at the three Lower Snake River Plants. The requested Hitachi high-voltage (HV), HV neutral, and low-voltage (LV) bushings will be direct replacements for existing Hitachi (previously, Westinghouse) bushings on the T1 and T2 GSU transformers at the LSR Projects.

b. Alternatives: There are no viable alternatives to specifying the use of Hitachi bushings.

c. Impact if not approved: The purpose of this procurement is to acquire spare transformers for existing transformers at the LSR hydroelectric powerhouses to ensure that, in the event of a transformer failure, the lost generation will be minimized. To effectively mitigate potential lost generation, it is essential that the spare transformers be equipped with identical Hitachi bushings as those installed on the existing transformers, or otherwise, modifications to the existing electrical systems (e.g., the bus ducts) will be required during a transformer failure. Such modifications take time and money to develop and implement, which would increase the amount of power generation and revenue lost during a failure. For these reasons, the bushings described in Section 3 are essential to the Government's requirements and available from only one source.

If NWW does not specify the Hitachi bushings described above, the transformer manufacturer may provide alternative bushings that meet the transformer design requirements but do not fit up with the existing electrical bus duct system currently installed at the LSR hydroelectric powerhouses. If the transformer bushings are supplied by another manufacturer and they do not fit up to the existing bus duct correctly, significant modifications to the existing electrical bus duct system may need to be made. No other bushing will meet the specific design requirements to properly attach to the existing bus duct. Other bushing options are taller, which could result in violating the existing equipment electrical clearances and requiring significant changes to the busses. Changes to the existing busses would cost at a minimum [redacted] in total project costs.

7. Efforts To Obtain Competition: A Special Notice announcing Industry Day was posted on SAM.gov under W912EF25R0010 on 27 November 2024 through 12 December 2024. Industry Day was held on 18 December 2024 and the following five small business contractors attended: [redacted] All contractors agreed that no small business can manufacture the transformers and at least 80% of the work would be subcontracted to a large business. Therefore, this requirement will be competed using full and open competition. In accordance with FAR 5.201, this notice shall be published with the solicitation and any bids or proposals received shall be considered. The Government has determined due to the impacts listed above, that there are no alternatives to having the transformer manufacturer install the Hitachi bushings. In accordance with Defense Federal Acquisition Regulations Supplement (DFARS) PGI 206.302-1(d), a special notice was issued on 10 June 2025 and closed 17 June 2025. One response was received from [redacted] stating "[redacted] has supplied Hitachi (formerly ABB, formerly Westinghouse) bushings to the USACE over the past 16 years. In my experience, there is no substitute and normally these are brand name only." No other responses were received.

The Contracting Officer will publish the notices required by FAR 5.201 and any proposals received will be considered.

8. Actions To Increase Competition: There is no action to increase competition. The procurement for the spare transformers is going out as a full and open competition. Each offeror will need to work with their transformer manufacturer to determine the cost for providing the spare transformers with the specified Hitachi bushings.

9. Market Research: Market research has identified that there are no viable options to procuring the spare transformers with the specified Hitachi bushings installed.

10. Interested Sources: No other interested sources were identified for the brand name requirements specified in this J&A.

11. Other Facts:

a. Procurement History: Similar voltage bushings were recently sole sourced to Hitachi on contract W912EF23P0009; and a J&A to sole source the same voltage bushings was approved on solicitation W912EF23R0008.

Similar voltage bushings were recently sole sourced to Hitachi on contract W912EF23P0009 under the authority of 10 U.S.C. 3204(a)(1) and FAR 6.302-1.

W912EF23R0008 was not awarded but had an approved J&A to sole source Hitachi GSU Transformer High Voltage (HV) Bushings under the authority of 10.U.S.C. 2304(c)(1) as implemented by FAR 6.302-1(a)(2)(iii). This procurement was for a larger contract with a sole source component, similar to the current action. The procurement was set aside for small business but ultimately no award was made.

b. Other Facts: N/A

[redacted]

11. TECHNICAL CERTIFICATION:

I certify that the supporting data under my cognizance which are included in the justification are accurate and complete to the best of my knowledge and belief.

NAME: Peter Kleine

TITLE: Design Lead Engineer

SIGNATURE: KLEINE.PETER.EDWARD.[redacted] Digitally signed by KLEINE.PETER.EDWARD[redacted] Date: 2025.08.01 10:15:11 -07'00'

12. REQUIREMENTS CERTIFICATION:

I certify that the supporting data under my cognizance which are included in the justification are accurate and complete to the best of my knowledge and belief.

NAME: Greg Linklater

DATE: _____

TITLE: Project Manager

SIGNATURE: LINKLATER.GREG.CLARK.[redacted] Digitally signed by LINKLATER.GREG.CLARK.[redacted] Date: 2025.08.01 10:50:13 -07'00'

13. FAIR AND REASONABLE DETERMINATION:

I hereby determine that the anticipated cost or price to the Government for this contract action will be fair and reasonable. A thorough cost and price analysis will be performed prior to negotiations, and the negotiated price will be compared and related to an independent government estimate prior to acceptance.

NAME: Jani Long

DATE: _____

TITLE: Contracting Officer

SIGNATURE: LONG.JANI.C[redacted] Digitally signed by LONG.JANI.C[redacted] Date: 2025.08.01 12:54:26 -07'00'

14. PROCURING CONTRACTING OFFICER CERTIFICATION:

I certify that this justification is accurate and complete to the best of my knowledge and belief.

NAME: Jani Long

DATE: _____

TITLE: Contracting Officer

SIGNATURE: LONG.JANI.C[redacted] Digitally signed by LONG.JANI.C[redacted] Date: 2025.08.01 12:54:56 -07'00'

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Control No. 25-0016

Approval

Based on the foregoing justification, I hereby approve the procurement of Hitachi brand high, neutral, and low-voltage bushings in the amount of $1,691,335.30 on an other than full and open competition basis. Award is pursuant to the authority of 10 U.S.C. §3204(a)(1) as implemented in FAR 6.302-1(a)(2)(iii)(A), subject to availability of funds, and provided that the Supplies and Services herein described have otherwise been authorized for this acquisition.

Date: 6 Aug 25

Laura Eichhorn Digitally signed by EICHHORN.LAURA.J.[redacted] Date: 2025.08.06 10:01:26 -04'00'

LAURA J. EICHHORN
Command Advocate for Competition

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