JUSTIFICATION FOR
OTHER THAN FULL & OPEN COMPETITION

The following Justification for Other than Full & Open Competition is prepared in accordance with FAR Subpart 6.303-2.

1. ORGANIZATION:

Federal Energy Regulatory Commission (FERC)
Office of the Executive Director
Acquisition Services Division
888 1st Street, NE
Washington, DC 20426

2. NATURE AND/OR DESCRIPTION OF ACTION BEING APPROVED:

It is the intent of the FERC to obtain next-day and next-month natural gas pricing information from Argus Natural Gas for the aforementioned location.

The basis for limiting the sources for this acquisition is due to the proprietary nature of Argus' natural gas pricing information. Commission staff needs to confirm the liquidity of Argus indices in the instance they are referenced in Commission-jurisdictional tariffs. The only way to confirm the liquidity of Argus indices is to purchase historical pricing information.

3. DESCRIPTION OF REQUIREMENT:

In accordance with agency objectives, the government has a need to procure next-day and next-month physical natural gas pricing information in a database format. This would include both front-end and back-end access via an automated procedure such as an API. The estimated dollar value of this procurement is $195,525.13.

4. STATUTORY AUTHORITY:

The statutory authority permitting other than full and open competition is 41 U.S.C. 253(c)(3) in accordance with:

[**X**] FAR 6.302-1, only one responsible source and no other supplies and services will satisfy Agency Requirements;

[ ] FAR 6.302-2, Unusual and compelling urgency;

[ ] Other, defined below:

FAR 6.302-3 Industrial mobilization; engineering development or research capability; or expert services.

5. DEMONSTRATE PROPOSED CONTRACTOR'S UNIQUE QUALIFICATIONS:

Only Argus Media provides Argus pricing information. Argus pricing information is only available through a subscription.

6. SOURCES SOUGHT EFFORTS:

The Commission is subscribing to all approved price index developers in order to ensure the liquidity of natural gas indices references in FERC jurisdictional tariffs.

7. DETERMINATION OF FAIR & REASONABLE PRICING:

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Pricing is comparable to other enterprise subscriptions that provide relatively similar data.

8. DESCRIPTION OF MARKET RESEARCH CONDUCTED & RESULTS:

The Commission already has subscriptions and ongoing access to the data reported in four specific gas and electric market indices. FERC currently has subscriptions to four of these indices (Bloomberg, ICE, Platts, and NGI). The addition of Argus Natural Gas enables us to complete the set.

9. ANY OTHER FACTORS SUPPORTING THE USE OF OTHER THAN FULL AND OPEN COMPETITION:

Argus Natural Gas provides the Commission with ongoing access to sources of market data used by regulated market participants. It enables Commission staff to observe index behavior for potential anomalies which may be indicative of a loss of adequate quality or liquidity, which could negatively impact the credibility of that index, and could undermine the fair and reasonable nature of rate tariffs based on the use of that index.

There is no other source for Argus natural gas pricing information.

10. A LISTING OF THE SOURCES, IF ANY, THAT EXPRESSED, IN WRITING, AN INTEREST IN THE ACQUISITION.

None

11. A STATEMENT OF THE ACTIONS, IF ANY, THE AGENCY MAY TAKE TO REMOVE OR OVERCOME ANY BARRIERS TO COMPETITION BEFORE ANY SUBSEQUENT ACQUISITION FOR THE SERVICES REQUIRED:

None

12. CERTIFICATIONS & APPROVALS: (Signatures are required)

Technical & Requirements Certification:
I certify that the supporting data under my cognizance that are included in this document are accurate and complete to the best of my knowledge and belief.

JEFFREY SAWYER
Digitally signed by JEFFREY SAWYER
Date: 2026.06.05 13:33:02 -04'00'

Date

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

Contracting Officer
Acquisition Services Division
Office of the Executive Director
Federal Energy Regulatory Commission

Date