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JUSTIFICATION REVIEW DOCUMENT – JUSTIFICATION AND APPROVAL (J&A)		
CONTROL #	[redacted]	
Program/Equipment	Siemens Energy Management and Control Systems (EMCS) a proprietary system that operates 100% of the Naval Hospital Twentynine Palms (NHTP), Twentynine Palms, California	
Authority:	10 U.S.C 3204(a)(1) as implemented by RFO 6.103-1	**AMOUNT** [redacted]
Prepared by:	**Name: La Rhonda Archie** **Title:** Contract Specialist	**Phone**: 251-441-5539
Contracting Officer *(See Sections 13-14 Below)*	**Name: Chris A. Maund** **Title:** Contracting Officer	**Phone:** 251-232-6172
Technical Rep *(See Section 11 Below)*	**Name:** Brandy Baker **Title:** Technical Manager	**Phone:** 251-721-4675
Requirements Rep *(See Section 12 Below)*	**Name:** Krishna (Kel) Morrissette **Title:** Lead Technical Manager	**Phone:** 251-694-4016
Signatures Are Required Below:		
I have reviewed this justification and find it adequate to support other than full and open competition		
Deputy for Small Business	**Signature:** RODGERS.SONYA.D.[redacted] Digitally signed by RODGERS.SONYA.D[redacted] Date: 2026.07.28 15:13:26 -05'00'	**Date:** *(See Signature)*
	Name: *(See Signature)*	**Phone:** 251-441-3597
Project Manager *(If no PM, use N/A)*	**Signature:** GRUNENBERG.LASHAUNDA.N[redacted] Digitally signed by GRUNENBERG.LASHAUNDA.N[redacted] Date: 2026.07.22 09:29:05 -05'00'	**Date:** *(See Signature)*
	Name: *(See Signature)*	**Phone:** 251-656-3855
Office of Counsel (OC)	**Signature:** ANGUS.KALEY.ELIZABETH[redacted] Digitally signed by ANGUS.KALEY.ELIZABETH[redacted] Date: 2026.07.22 14:08:50 -05'00'	**Date:** *(See Signature)*
	Name: *(See Signature)*	**Phone:** *(See Signature)*
Business Oversight Branch (BOB) Chief	**Signature:** James K. Keeling Date: 2026.07.31 19:33:42 -05'00'	**Date:** *(See Signature)*
	Name: *(See Signature)*	**Phone:** 251-441-5591
Chief of Contracting Office (CoCO)	**Signature:** James K. Keeling Acting District Contracting Chief Date: 2026.07.31 19:34:41 -05'00'	**Date:** *(See Signature)*
	Name: *(See Signature)*	**Phone:** 251-441-6501

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

1. **Contracting Activity:** U.S. Army Corps of Engineers (USACE), Directorate of Contracting, Mobile Regional Contracting Center, P.O. Box 2288, Mobile, Alabama 36628-0001.

2. **Description of Action:** This is a J&A for a new firm-fixed-price contract for Operation & Maintenance with incidental Repair a projects utilizing Operations & Maintenance (O&M) funding, Fiscal Year (FY) 2026 funds. The action requires the inclusion of a brand name specification for Siemens Energy Management and Control Systems (EMCS). Solicitation # W9127826RA003 is for the O&M with Repair Indefinite Delivery Indefinity Quantity (IDIQ) Multiple Award Task Order Contract (MATOC) for the West of the Mississippi (WOM) Region.

The period of performance for the seed project, Navy Hospital Twentynine Palms (NHTP), is a one-year base period with four one-year options for a total of five years. This brand name J&A is limited to the seed project task order and is not applicable to the base contracts or any subsequent task orders expected under this MATOC.

3. **Description of Supplies/Services:** The proposed action is to provide maintenance, upgrades, and necessary proprietary components for the Siemens EMCS at NHTP and outlying medical clinics in Twenty-Nine Palms, California. The Siemens EMCS is a network of microprocessor-based programmable controllers with varying levels of intelligence and networking capabilities, consisting of local control modules, command control modules, and personal computer interfaces.

The estimated total value of this requirement is over a five-year period (incorporating Fiscal Years 2027 through 2031).

4. **Authority Cited:** The statutory authority permitting other than full and open competition is the Revolutionary FAR Overhaul (RFO) 6.103-1, "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements," as it applies to brand name justifications.

5. **Reason for Authority Cited:** Application of the Siemens EMCS is essential to meeting the Government's requirements, thereby precluding consideration of another product. The Twentynine Palms EMCS system currently serves 100% of the facilities consisting of Siemens EMCS.
The EMCS is critical to the medical mission and sustainment of Naval Hospital Twentynine Palms. They do not make this subject data available to other manufacturers or third-party service providers. Substituting this system with another manufacturer's system would require replacing the existing infrastructure, causing unacceptable delays in fulfilling the agency's requirements and resulting in a substantial duplication of cost to the Government that is not expected to be recovered through competition.

Background: The NHTP and its outlying medical clinics in Twentynine Palms, California, rely heavily on their EMCS for mission-critical operations, medical sustainment, and climate controls. Currently, the Siemens EMCS is installed and serves approximately

100% of the facilities. This system functions as a complex network of microprocessor-based programmable controllers utilizing three primary components:

- Local Control Modules: Directly wired to sensors and actuators to control space conditioning equipment (e.g., pumps and fans).
- Command Control Modules: Responsible for automated, high-level control decision-making.
- Computer Interface: Simplifies facility operator control through a user-friendly graphical interface.

Siemens has provided specialized maintenance and software upgrades for this platform since its initial installation. Under the upcoming requirement spanning Fiscal Years 2027 through 2031, the Mobile District anticipates executing multiple Firm-Fixed-Price, O&M with incidental Repair and Minor Construction contracts funded by O&M appropriations.

Justification: The EMCS is absolutely critical to the daily healthcare mission and facility sustainment of NHTP. Siemens alone possesses the proprietary technical data, software codes, and specialized diagnostics necessary to upgrade, patch, and maintain its software. Siemens does not license or make this proprietary data available to third-party service providers or other original equipment manufacturers (OEMs). Because only Siemens EMCS-certified components and software can interface with the existing architecture, the application of the brand-name Siemens EMCS is essential to meet the Government's strict operational integration requirements. This technical reality precludes the consideration of any alternative product.

Alternative: The only technical alternative to specifying the brand-name Siemens EMCS is a complete system replacement across the facility's existing EMCS footprint. This alternative would require removing all existing Siemens local control modules, command control modules, wiring, and interface software, and replacing them with a completely new EMCS product line from a different manufacturer.

Impact: Pursuing a complete system replacement would cause severe and unacceptable delays in fulfilling the agency's medical mission and facility sustainment requirements at NHTP. Any system downtime or failure to maintain the EMCS due to procurement delays would directly compromise critical clinical climate controls, potentially impacting patient safety, medical equipment calibration, and active hospital operations.

6. **Efforts to Obtain Competition:**

a. Effective competition: The Contracting Officer published the notice on the System for Award Management (SAM). In accordance with RFO 5.201 a Notice of Intent (NOI) under Notice ID W9127826RA003 for NAICS 236220, Commercial and Institutional Building Construction, to include the brand name specifications for Siemens EMCS equipment was posted to SAM.gov on 11 May 2026 with a response date of 02 June 2026. No responses were received.

b. Subcontracting competition: Siemens EMCS equipment is commercially available off-the-shelf equipment. The equipment will be purchased by subcontract of the competitively selected prime contractor for the continued O&M coverage at Twentynine Palms and its outlying buildings.

7. **Actions to Increase Competition:** There are no known actions to be taken to increase competition for similar future procurements that would not result in increased project costs, reduced efficiencies and increased overhead costs from installation and maintenance of an entirely different EMCS equipment system.

8. **Market Research:** A special notice under Notice ID W9127826RA003 was posted to SAM.gov on 11 May 2026 and requested responses by 2 June 2026. The special notice stated the intent was to use a brand name specification for the EMCS equipment and requested interested parties to submit their qualifications. No responses were received to this special notice.

9. **Interested Sources:** To date, no other sources have written to express interest.

10. **Other Facts:** Reasonable efforts to retrieve the following items from computer records, contract files, competition advocate office files or other sources to support the use of other than full and open competition as follows:

a. Procurement history:

(1) This is a new procurement. It will be competed as the seed project via a MATOC solicitation.

b. Other Facts: There are no additional facts to add in support of Siemens EMCS J&A.

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: Brandy Baker
Title: Technical Manager

BAKER.BRANDY.E.1 Digitally signed by BAKER.BRANDY.E Date: 2026.07.15 11:40:34 -05'00' Date: See Signature

Signature

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: LaShaunda (Nichole) Grunenberg
Title: Acquisition Program Manager

GRUNENBERG.LASHAUNDA.N Digitally signed by GRUNENBERG.LASHAUNDA. Date: 2026.07.22 09:02:15 -05'00' Date: See Signature

Signature

13. **Fair and Reasonable Cost Determination:** I hereby determine that the anticipated cost to the Government for this contract action will be fair and reasonable based on analysis that includes comparison with the Government Estimate. In accordance with RFO 15.403-2(b)(1), Certified Cost & Pricing Data will not be required for this action.

Name: Chris A. Maund
Title: Contracting Officer

MAUND.CHRIS.A. Digitally signed by MAUND.CHRIS.A. Date: 2026.07.22 09:48:53 -05'00' Date: See Signature

Signature

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

Name: Chris A. Maund
Title: Contracting Officer

MAUND.CHRIS.A Digitally signed by MAUND.CHRIS.A Date: 2026.07.22 09:49:09 -05'00' Date: See Signature

Signature

Approval

Based on the foregoing justification, I hereby approve the procurement of SIEMENS EMCS equipment on an other than full and open competition basis pursuant to the authority of RFO 6.103-1, Defense Federal Acquisition Regulation Supplement (DFARS) 206.104-72 (DFARS CD 2026-O0017, Rev 1), and 10 U.S.C. 3204(a)(1). The approval is subject to availability of funds, and provided that the services and property herein described have otherwise been authorized for acquisition.

Approved By:

MAUND.CHRIS.A[redacted] Digitally signed by MAUND.CHRIS.A[redacted] Date: 2026.07.31 15:12:49 -05'00' Date: See Signature

CHRIS A. MAUND
Contracting Officer
U.S. Army Corps of Engineers, Mobile District