

DEPARTMENT OF VETERANS AFFAIRS

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

Acquisition Plan Action ID: 36E776-19-AP-0057

1. **Contracting Activity:** Department of Veterans Affairs, Program Contracting Activity Central (PCAC) will be responsible for executing this requirements-type contract. No 2237 is necessary at this time, as funds will not be obligated with the award of this requirements contract. Rather, funds will be obligated by Network Contracting Office (NCO) 1 once a need arises.
2. **Nature and/or Description of the Action Being Processed:** This action is for a requirements-type contract for the supply and delivery of compressed natural gas (CNG) to the White River Junction VA Medical Center, located at 163 Veterans Drive, White River Junction, VT 05009, and conducted in accordance with FAR 13.5 Simplified Procedures for Certain Commercial Items and specifically FAR 13.501 Special Documentation Requirements, where acquisitions conducted under Simplified Acquisition Procedures are exempt from the requirements of FAR Part 6, but still require a justification using the format of FAR 6.303-2.
3. **Description of Supplies/Services Required to Meet the Agency's Needs:** The White River Junction VAMC is currently in the Investment Grade Audit (IGA) phase of an Energy Savings Performance Contract (ESPC) that will convert the existing boiler from fuel oil-fired to natural gas-fired. CNG was identified as an economically viable option, since there is no existing natural gas utility company in the area. Therefore, CNG supply will be needed once construction is complete, and commissioning is performed. PCAC plans to award a five (5) year requirements-type contract, with a planned period of performance of November 1, 2019 – October 31, 2024. The start date will be dependent on when commissioning takes place. Therefore, the effective date will be either November 1, 2019, or the date commissioning is complete; whichever occurs later.
4. **Statutory Authority Permitting Other than Full and Open Competition:**

The authority for applying the Simplified Procedures for Commercial Items of FAR 13.5 is 41 U.S.C. 1901 and is implemented by restricting competition on this procurement via FAR 13.106-1(b)(2).
5. **Demonstration that the Contractor's Unique Qualifications or Nature of the Acquisition Requires the Use of the Authority Cited Above (applicability of authority):** As mentioned in section 3 above, this requirement is directly related to an ESPC project that is in process at the White River Junction VAMC. An ESPC is a firm fixed-price multiyear contract with a term not to exceed 25 years for the performance of services for the design, acquisition, installation, testing, measurement and verification, and, where appropriate, operation, maintenance, repair, and replacement, of identified energy or water conservation measures. The authority for agencies to enter into these contracts is

provided by 42 U.S.C. § 8287. The contractors receiving an ESPC award are referred to as Energy Service Companies (ESCOs). ESCOs are responsible for financing the costs of implementing such energy or water conservation measures, and are subsequently paid via the cost savings to the agency, which must be guaranteed. The ESCO for this project is TL Services, Inc., which is a service-disabled veteran-owned small business (SDVOSB).

Typically, an ESPC project will result in decreased energy or water costs to an agency's already existing utility services. For example, lighting upgrades and solar photovoltaic (PV) systems may reduce an agency's overall electricity costs, but the agency will still continue paying electricity bills to its existing utility provider just as it has done in the past.

The ESPC project for the White River Junction VAMC consists of only one energy conservation measure: the conversion of the existing fuel oil-fired boiler to a natural gas-fired boiler. Due to the lack of a natural gas pipeline network being available, CNG was found to be a viable solution for the purpose of this project.

CNG service occurs as follows:

- The CNG supplier takes natural gas from compression terminals located on interstate pipelines and fills CNG trailers;
- The CNG is transported via these trailers to the customer;
- CNG suppliers own and install specialized decompression equipment at the customer's facility. The trailers are then connected to the decompression equipment onsite in order to provide safe, reliable natural gas. The trailers act as both transport and onsite storage.
- The CNG supplier then monitors the volumes and swaps out trailers to ensure no interruptions in service.

ESPCs are a particularly unique contracting vehicle in that the ESCOs perform the IGA at-risk, and are not entitled to recover costs incurred (typically within a not-to-exceed amount) unless the VA moves forward with the project via a contract or task order award for implementation. The IGA results in a proposal submitted by the ESCO to the VA that, among other information, includes a 30 percent design package, a firm, fixed-price for the overall cost of the project and the guaranteed annual savings amount the ESCO will be held to throughout the term of the contract.

In order to provide this proposal to the VA, TL Services had to make some subcontractor selections prior to any task order being awarded for implementation. As noted above, the CNG supplier provides specialized equipment to the facility, where the gas will be decompressed and piped into the facility for use by the converted natural gas-fired boiler. Without having a CNG supplier selected, TL Services would have difficulty completing an acceptable 30 percent design package, and – perhaps more importantly – would find it problematic to come up with a guaranteed annual savings amount.

TL Services, Inc. issued a request for proposal (RFP) on July 19, 2018 for compressed natural gas service. The scope of work consisted of providing pricing information for the supply and delivery of compressed natural gas, as well as the design, installation and commissioning of the decompression station to be placed onsite. The RFP was sent to the following CNG suppliers: Xpress Natural Gas LLC (XNG) and NG Advantage, LLC. These CNG suppliers currently provide similar services at nearby hospitals (non-VA), so TL Services and the VA conducted site visits to these facilities to ask questions regarding performance and overall satisfaction. Proposals were due August 2, 2018, and only one proposal was received. The proposal was submitted by XNG, and TL Services sent the proposal to the VA for review. NG Advantage, LLC fully intended to submit a proposal, but ended up passing on

the opportunity due to a recent deal it made with a utility company that was going to require a significant investment in new CNG decompression equipment, and could subsequently impact its ability to meet the VA's schedule.

A call was then held with XNG, TL Services and the VA on August 3, 2018 to better understand the pricing structure of the CNG service. The same day, TL Services moved forward with a subcontractor award to XNG as the CNG service provider for this project.

Upon the anticipated award of a task order following the IGA proposal from TL Services, the VA intends to enter into a requirements-type contract with XNG for the CNG supply and delivery. Entering into a formal contract at this time is necessary so that XNG can order the necessary equipment, as some equipment has long lead times, and XNG is not going to make such an investment unless there is consideration provided by the VA. The requirements-type contract provides the consideration that, if a need arises for CNG during the agreed upon period of performance, the VA is required to purchase it from XNG.

If the VA were to conduct its own procurement to find a CNG provider at this point in the ESPC process, the entire project would be jeopardized, and would at best experience significant delays. There would also be a duplication of costs involved, since TL Services would need to revisit the project design, overall cost and guaranteed savings with the selected CNG provider. And since TL Services already issued a competitive RFP for the CNG requirements, the VA would not expect to reduce any costs by conducting its own procurement. Accordingly, XNG is the only firm capable of providing the supplies and services described in Section III above without the VA experiencing substantial duplication of cost that could not be expected to be recovered through competition and unacceptable delays in fulfilling its requirements.

6. **Description of Efforts Made to ensure that offers are solicited from as many potential sources as deemed practicable:** TL Services solicited offers from multiple CNG suppliers currently providing similar services to nearby hospitals. This proposed action will be synopsized in the form of a Notice of Intent to Sole Source, and, in accordance with FAR 5.203(a), the contracting officer will allow the notice to be published for 15 days prior to moving forward with a contract award. The contract file will be documented to reflect any responses received during this time.
7. **Determination by the CO that the Anticipated Cost to the Government will be Fair and Reasonable:** The cost for CNG consists of two basic component: a service adder and the commodity costs. The service adder includes transportation/delivery costs, onsite equipment and maintenance, as well as scheduling and logistics. The commodity cost includes the applicable commodity price (whether locked into a fixed price or the index price for an applicable month), as well as a marketer's adder for pipeline capacity. The commodity cost cannot be determined at this time, as the VA would only lock in a price (if advantageous) once the facility is ready to start using gas. So, for the purposes of determining the price fair and reasonable, only the service adder can be analyzed at this time.

The service adder proposed by XNG is \$6.90/dekatherm (Dth). The contracting officer has determined this price to be fair and reasonable based on competitive CNG proposals submitted for another VA project in Togus, ME when CNG was being considered as a potential replacement of fuel oil. For the Togus project, XNG's service adder for a five-year term with similar annual consumption requirements was \$6.50/Dth. NG Advantage also submitted a proposal, with a service adder of \$10.30/Dth.

Additionally, the estimated cost is fair and reasonable based on a comparison to historical expenditures made for fuel oil. In order to complete the Independent Government Cost Estimate (IGCE), the commodity costs needed to be estimated based on current futures prices (see contract file for complete IGCE). Below is a summary of the estimated annual costs, and the total estimate cost for the five year period of performance:

	Estimated Consumption (Dth)	Estimated Total Cost
Year 1	80,199	\$826,593.08
Year 2	80,199	\$819,166.67
Year 3	80,199	\$817,888.81
Year 4	80,199	\$820,845.53
Year 5	80,199	\$829,070.69
TOTAL	400,995	\$4,113,564.78

Comparatively, the White River Junction VAMC spent \$1,367,980 on fuel oil during calendar year 2018. So, when compared to fuel oil (similar item in a related industry, FAR 13.106-3), the estimated cost is certainly fair and reasonable.

8. Description of the Market Research Conducted and the Results, or a Statement of the Reasons

Market Research Was Not Conducted: As described above, the nature of the ESPC process resulted in a situation where the VA could not feasibly conduct its own procurement for this requirement, mainly due to the fact there was no requirement for the VA to take action on. Again, the IGA process is conducted at-risk by the ESCO, and requires early involvement from key subcontractors, such as the CNG provider. The need for a contract for the supply and delivery of CNG does not arise until the task order for implementation is awarded.

However, in the spirit of ensuring the contract file is documented to comply with the Veterans First Contracting Program and PPM 2016-05, the Vendor Information Pages (VIP) search results under North American Industrial Classification System (NAICS) code 221210 (natural gas distribution) – the anticipated NAICS code – are included as Attachment 1. The search results indicated a total of 34 verified service-disabled veteran-owned small businesses (SDVOSBs) or veteran-owned small businesses (VOSBs) registered under NAICS code 221210. Of the 34, a total of 15 included Vermont in the company's service area. Additional research, via the company websites provided on the VIP, was conducted for these 15 companies in order to determine if any were in the business of supplying and delivering CNG. Based on the available information, the contracting officer did not have a reasonable expectation that any could provide the supply and transportation of CNG for the White River Junction VAMC.

Additionally, a notice of intent to sole source this requirement was posted to the Federal Business Opportunities (FBO) website on March 21, 2019, with any responses due April 1, 2019 at 12:00 p.m. EDT. No responses were received. The notice of intent to sole source is included as Attachment 2.

9. Any Other Facts Supporting the Use of Other than Full and Open Competition: None.

10. Listing of Sources that Expressed, in Writing, an Interest in the Acquisition: The following sources expressed interest in this requirement, when the RFP was issued by TL Services as part of the ESPC process:

- Xpress Natural Gas, LLC
- NG Advantage, LLC

11. A Statement of the Actions, if any, the Agency May Take to Remove or Overcome any Barriers to Competition before Making subsequent acquisitions for the supplies or services required: As

described above, the uniqueness of the ESPC process is the driving factor restricting competition for this requirement. However, it is fully anticipated that any requirement following the completion of the initial contract will be solicited for by the VA, thus removing the barriers to competition encountered in this case. If there is still a need for CNG, market research and acquisition planning will be conducted in order to determine the best path forward.

12. Requirements Certification: I certify that the requirement outlined in this justification is a Bona Fide Need of the Department of Veterans Affairs and 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.

BESSIE
GEWIRTZ
108176

Digitally signed by
BESSIE GEWIRTZ 108176
Date: 2019.04.01
14:17:45 -04'00'

BESSIE (BAYLA) GEWIRTZ
Program Manager
Office of Asset and Enterprise Management

Date

13. Approvals in accordance with the [VHAPM Part 806.3 OFOC SOP](#):

- a. **Contracting Officer or Designee's Certification (required):** I certify that the foregoing justification is accurate and complete to the best of my knowledge and belief.

Andrew J.
Neiss 198419

Digitally signed by
Andrew J. Neiss 198419
Date: 2019.04.01 14:19:45
-04'00'

ANDREW J. NEISS
Contracting Officer
Program Contracting Activity Central (PCAC)

Date

- b. **One Level Above the Contracting Officer (Required over SAT but not exceeding \$700K):** I certify the justification meets requirements for other than full and open competition.

RICHARD DAHMEN
Director of Contracting
Program Contracting Activity Central (PCAC)

Date

- c. **VHA SAO HCA Review and Approval:** I have reviewed the foregoing justification and find it to be complete and accurate to the best of my knowledge and belief and recommend approval (if over \$68 million) or approve (\$700K to \$68 million) for other than full and open competition.

RANDY L. HAYS
Acting Executive Director
Service Area Office Central (SAO-C)

Date

NAICS: 221210

2/20/2019 3:49 PM

Search Criteria

Duns	BusinessName	DbName	City	State	WebSite	ExpirationDate	Vermont in Service Area?	CNG Supply/Delivery?
808980846	ADVANCED CONSTRUCTION SERVICES INC.		Norman	Oklahoma	www.acs-ba.com	8/14/2021	Yes	No
104864809	AMK Energy Services LLC		Bountiful	Utah	www.amkennergyservices.com	2/26/2021	Yes	No
079187529	AnClar Associates LLC		Wethersfield	Connecticut	www.ancclarassociates.com	7/6/2019	Yes	No
135020316	B&M Construction, Inc		Colorado Springs	Colorado	www.bmc-i.com	8/26/2019	No	
080006431	Brush Country Energy Solutions, LLC		Taft	Texas		4/22/2019	No	
080959544	Csrx Solutions Inc.		Tallahassee	Florida		2/1/2021	No	
079741357	Diverse Worldwide & Associates Inc		Apopka	Florida	http://diverseworldwide.com/	12/1/2019	Yes	No
788718273	DJS Construction Services, Inc.		Dublin	Georgia		1/10/2020	No	
963318857	E.C. SMITH, INC.		ANDERSON	California		1/9/2020	No	
963849240	Energi Transport LLC		Columbia	South Carolina	www.energitransport.com	9/2/2019	No	
079802214	Green Leaf Builders, Inc.		Salisbury	Oklahoma		12/11/2021	No	
944162135	Ground Level Construction, Inc.		Concord	California	www.groundlevelconstruction.com	7/27/2019	No	
080667174	HALO Industries, LLC		Wilton Manors	Florida	www.haloindustriesslc.com	9/20/2020	Yes	No
080107820	Homeland Mechanical LLC		Quincy	Massachusetts	www.homelandmechanicalma.com	3/4/2019	No	
078763453	IPW Construction Group, LLC		North Charleston	South Carolina	www.ipwccg.com	9/11/2021	No	
058034691	Jackson Enterprises USA Inc		Orlando	Florida	GovFacilityManagement.com	7/26/2020	No	
079258470	Kimble's Aviation Logistical Services Inc.		Georgetown	Delaware	kimblesdls.com	1/23/2020	Yes	No
079341870	Liberty Fuel, LLC		Van Buren	Arkansas		5/2/2019	No	
080368922	Mid-Continent Group LLC		Oklahoma City	Oklahoma	mid-congroup.com	12/12/2020	No	
008638843	PowerCom Corporation		Lake Zurich	Illinois	www.powercom-corp.com	12/12/2020	No	
136200164	Randolph Joseph Williford	R. W. Project M	Mart	Texas		11/30/2020	Yes	No
187408455	RTH Mechanical Contractors, Inc.		Brentwood	New Hampshire	http://rthmechanical.com	2/20/2022	Yes	No
175224299	RTM Enterprises, Inc.		East Amherst	New York	http://www.rtmenergy.com	2/15/2022	Yes	No
831442145	SageCare, Inc.		Tampa	Florida	www.sagecarecorp.com	2/1/2022	Yes	No
039955965	Sargent's Mechanical Systems, Inc.	Sargent Constr	Oxnard	California	http://www.sergentconstructionserv	9/10/2021	No	
173056040	Storfi Quality Consulting, Inc.		Willow Grove	Pennsylvania	http://www.storficonsulting.net/	4/26/2019	Yes	No
832317973	Tayrona Investments LLC	Tayrona Oil	Greenacres	Florida	http://www.Tayronausa.com	9/28/2021	Yes	No
080938279	Terraformance LLC		Las Vegas	Nevada	www.terra-formance.com	12/18/2020	Yes	No
079561660	Trident Global Solutions LLC		Scottsboro	Alabama		12/20/2020	No	
055997900	TSUNAMIHAPPY LLC.		GREENFIELD	Indiana	www.tsunamihappy.com	4/26/2019	Yes	No
040169267	US Civil & Industrial, LLC		Glendale	Arizona	www.uscivilindustrial.com	8/18/2020	No	
065625923	V. Lopez Jr and Sons General Engineering Contractors, Inc.		Santa Maria	California	www.vlopezrandsons.com	6/2/2019	No	
068209290	Williams-Sterling, Inc.		Lignum	Virginia	https://www.wsi-inc.net/	10/9/2021	No	
079862423	York Construction & Management Services, LLC.		Saint Charles	Illinois		5/15/2019	Yes	No



S--Notice of Intent to Sole Source Compressed Natural Gas (CNG) Service White River Junction VA Medical Center

Solicitation Number: NA

Agency: Department of Veterans Affairs

Office: VA National Energy Business Center

Location: VA National Energy Business Center

Notice Type:

Special Notice

Posted Date:

March 21, 2019

Response Date:

-

Archiving Policy:

Automatic, on specified date

Archive Date:

May 20, 2019

Original Set Aside:

N/A

Set Aside:

N/A

Classification Code:

S -- Utilities and housekeeping services

NAICS Code:

221 -- Utilities/221210 -- Natural Gas Distribution

Synopsis:

Added: Mar 21, 2019 3:23 pm

Page 1 of 1

Notice of Intent to Sole Source

The Department of Veteran Affairs, Program Contracting Activity Central (PCAC) intends to negotiate directly with Xpress Natural Gas LLC, a small business under North American Industrial Classification System (NAICS) code 221210 located at 300 Brickstone Square, Suite 1005, Andover, MA 01810, for the procurement compresses natural gas (CNG) service in support of an Energy Savings Performance Contract (ESPC) at the White River Junction, VT VA Medical Center under the authority of Federal Acquisition Regulation (FAR) 6.302-1, Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.

DESCRIPTION OF REQUIREMENT: The purpose of this contract is to procure CNG supply and transportation service in support of an ESPC contract that is converting the existing fuel oil-fired boiler to natural gas-fired. Due to the lack of an existing natural gas pipeline network in this geographic area, CNG was determined to be an economically viable solution.

ESPCs are a particularly unique contracting vehicle in that the Energy Service Company (ESCO) performs an Investment Grade Audit (IGA) at-risk and is not entitled to recover costs incurred (typically within a not-to-exceed amount) unless the VA moves forward with the project via a contract or task order award for implementation. The IGA results in a proposal submitted by the ESCO to the VA that, among other information, includes a 30 percent design package, a firm, fixed-price for the overall cost of the project and the guaranteed annual savings

amount the ESCO will be held to throughout the term of the contract.

In order to provide this proposal to the VA, the ESCO had to make some subcontractor selections prior to any task order being awarded for implementation. The entirety of the design for the project is dependent on the CNG solution the ESCO decides to move forward with. Without having a CNG provider selected, the ESCO would not be able to complete an acceptable 30 percent design package, and perhaps more importantly would find it problematic to come up with a guaranteed annual savings amount it will be held to throughout the term of the ESPC contract. The CNG supplier provides a turnkey solution, which includes owning and operating compression terminals at various interstate pipeline locations; owning and operating trucks and trailers necessary for CNG transport from the compression terminals to the customer s facility; and specialized, custom-built decompression equipment to be installed at the White River Junction VAMC where the gas will be decompressed and piped into the facility for use by the converted natural gas-fired boiler.

Based on the above, the ESCO conducted its own competitive selection process, and decided to select Xpress Natural Gas to be the CNG provider in order for this project to move forward. Thus, the VA intends to award a sole source contract to Xpress Natural Gas LLC for the supply and transportation of CNG effective if and when ESPC implementation phase is completed.

This notice of intent is not a request for competitive proposals, as this requirement is not available for competition. However, any responsible source who believes it is capable of meeting the requirement may submit a capability statement, proposal, or quotation, which shall be considered by the agency, only if received by the closing date and time of this notice. A determination not to compete the proposed requirement based upon the responses to this notice is solely within the discretion of the government.

Responses to this notice are due on or before April 1, 2019 at 12:00 p.m. EDT by email to andrew.neiss@va.gov.

Attachment

Type: Other (Draft RFPs/RFIs, Responses to Questions, etc..)

Posted Date: March 21, 2019

<https://www.vendorportal.ecms.va.gov/FBODocumentServer/DocumentServer.aspx?DocumentId=4846112&FileName=36E77619D0002-000.docx>

Description: 36E77619D0002 36E77619D0002.docx

Additional Info:

[Department of Veterans Affairs Homepage](#)

Contracting Office Address:

Department of Veterans Affairs;Program Contracting Activity Central;6150 Oak Tree Blvd, Suite 300;Independence OH 44131

Point of Contact(s):

Andrew Neiss

andrew.neiss@va.gov

andrew.neiss@va.gov

ALL FILES

[Attachment](#)



Mar 21, 2019

[36E77619D0002 36E77](#)

Opportunity History

- **Original Synopsis**

Mar 21, 2019

3:23 pm

36E776-19-AP-0057 – Compressed Natural Gas Supply and Delivery – White River Junction VA Medical Center**BACKGROUND INFORMATION:** Compressed Natural Gas Supply and Delivery – White River Junction VA Medical Center**1. DATE PREPARED:** April 1, 2019**2. PREPARED BY:** Andrew Neiss**3. DESCRIPTION OF REQUIREMENT:** Compressed natural gas supply and delivery for the White River Junction VA Medical Center.**4. PRODUCT OR SERVICE?** Service**5.NAICS/FSC/PSC:** 221210/S111**6. REQUESTOR:** Bessie (Bayla) Gewirtz**7. PHONE NO:** 202-632-6811**8. PLANNED/ACTUAL DATE SUBMITTED:**
April 1, 2019**9. PLANNED AWARD DATE:** May 3, 2019**10. ESTIMATED TOTAL COST:** \$4,113,564.78**11. ESTIMATED BASE PERIOD COST:** \$826,593.08**12. RISKS:** There are moderate schedule and cost risks associated with this requirement, and such risks will be managed/mitigated as follows:

- **Schedule:** The start of this contract is dependent on the implementation phase of the Energy Savings Performance Contract (ESPC), during which time the existing fuel-oil fired boiler will be converted to natural gas-fired. By entering into a requirements-type contract, the VA will not be committed to placing any orders until there is an actual need, which is important if there are delays during construction.
- **Cost:** Since natural gas is a commodity, there is always going to be some associated market risk. In order to reduce risk, the VA will be able to lock in a fixed price based on current market conditions at any time, and for any duration, if deemed advantageous. However, eliminating the cost risk in its entirety by locking into a fixed price at the time of award is not economically advantageous, as the VA would be paying a risk premium that is not necessarily warranted, based on the relative stability of the natural gas market.

13. OTHER CONSIDERATIONS: Upon a task order being awarded to TL Services, Inc. for implementation of an ESPC, the VA intends to enter into a requirements-type contract with Xpress Natural Gas, LLC for the CNG supply and delivery at the White River Junction VA Medical Center. XNG is the subcontractor TL Services, Inc. selected to provide specialized CNG equipment as part of the ESPC. Entering into a formal contract for CNG supply and delivery upon the award of the task order for ESPC implementation is necessary so that XNG can order the necessary equipment, as some equipment has long lead times, and XNG is not going to make such an investment unless there is consideration provided by the VA. The requirements-type contract provides the consideration that, if a need arises for CNG during the agreed upon period of performance, the VA is required to purchase it from XNG.

14. COMPETITIVE?YES ☐ NO ☒**15. REASON FOR OTHER THAN FULL AND OPEN****COMPETITION:** Only one responsible source – FAR 6.302-1
– See J&A for additional details**16. POTENTIAL SOURCES:** Xpress Natural Gas, LLC

17. DESCRIPTION OF MARKET RESEARCH EFFORTS CONDUCTED OR TO BE CONDUCTED: This requirement is directly related to an Energy Savings Performance Contract (ESPC) that is in process at the White River Junction VAMC. An ESPC is a firm fixed-price multiyear contract with a term not to exceed 25 years for the performance of services for the design, acquisition, installation, testing, measurement and verification, and, where appropriate, operation, maintenance, repair, and replacement, of identified energy or water conservation measures. The authority for agencies to enter into these contracts is provided by 42 U.S.C. § 8287. The contractors receiving an ESPC award are referred to as ESCOs. ESCOs are responsible for financing the costs of implementing such energy or water conservation measures, and are subsequently paid via the cost savings to the agency, which must be guaranteed. The ESCO for this project is TL Services, Inc., which is a service-disabled veteran-owned small business (SDVOSB).

Typically, an ESPC project will result in decreased energy or water costs to an agency's already existing utility services. For example, lighting upgrades and solar photovoltaic (PV) systems may reduce an agency's overall electricity costs, but the agency will still continue paying electricity bills to its existing utility provider just as it has done in the past.

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A call was then held with XNG, TL Services and the VA on August 3, 2018 to better understand the pricing structure of the CNG service. The same day, TL Services moved forward with a subcontractor award to XNG as the CNG service provider for this project.

Upon the anticipated award of a task order following the IGA proposal from TL Services, the VA intends to enter into a requirements-type contract with XNG for the CNG supply and delivery. Entering into a formal contract at this time is necessary so that XNG can order the necessary equipment, as some equipment has long lead times, and XNG is not going to make such an investment unless there is consideration provided by the VA. The requirements-type contract provides the consideration that, if a need arises for CNG during the agreed upon period of performance, the VA is required to purchase it from XNG.

If the VA were to conduct its own procurement to find a CNG provider at this point in the ESPC process, the entire project would be jeopardized, and would at best experience significant delays. There would also be a duplication of costs involved, since TL Services would need to revisit the project design, overall cost and guaranteed savings with the selected CNG provider. And since TL Services already issued a competitive RFP for the CNG requirements, the VA would not expect to reduce any costs by conducting its own procurement. Accordingly, XNG is the only firm capable of providing the supplies and services without the VA experiencing substantial duplication of cost that could not be expected to be recovered through competition, and unacceptable delays in fulfilling its requirements.

Additionally, a notice of intent to sole source this requirement was posted to the Federal Business Opportunities (FBO) website on March 21, 2019, with any responses due April 1, 2019 at 12:00 p.m. EDT. No responses were received. The notice of intent to sole source is included as Attachment 2.

18. *SMALL BUSINESS PROGRAMS

The Vendor Information Pages (VIP) search results under North American Industrial Classification System (NAICS) code 221210 (natural gas distribution) – the anticipated NAICS code – are included as Attachment 1. This NAICS code was determined to be appropriate due to the fact the majority of the total cost is related to the transportation/distribution of the compressed natural gas, as opposed to the natural gas commodity itself. This cost is referred to as the “service adder,” and is estimated to be \$6.90/dekatherm. This represents roughly 67 percent of the total estimated cost. See the independent government cost estimate (IGCE) for more details. The search results indicated a total of 34 verified service-disabled veteran-owned small businesses (SDVOSBs) or veteran-owned small businesses (VOSBs) registered under NAICS code 221210. Of the 34, a total of 15 included Vermont in the company’s service area. Additional research, via the company websites provided on the VIP, was conducted for these 15 companies in order to determine if any were in the business of supplying and delivering CNG. Based on the available information, the contracting officer would not have a reasonable expectation that any could provide the supply and transportation of CNG for the White River Junction VAMC.

<input type="checkbox"/> Service-Disabled Veteran-Owned Business Set-aside	<input type="checkbox"/> Veteran-Owned Business Set-aside	<input type="checkbox"/> 8(a) Set-Aside
<input type="checkbox"/> HUBZone Set-Aside	<input type="checkbox"/> Small Business Set-Aside	<input type="checkbox"/> Women- Owned Small Business Set Aside

19. PLANNED CONTRACT TYPE: Fixed-price, requirements

20a. COMMERCIAL ITEM OR SERVICE?

YES ☒ NO ☐

20b. If NO, could the requirement be changed to provide for commercial item or service?

YES ☐ NO ☐

21. IF SERVICES, ARE INHERENTLY GOVERNMENTAL FUNCTIONS INVOLVED? YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
22a. SUITABLE FOR PERFORMANCE-BASED? YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	22b. If performance-based unacceptable, provide explanation:
23a. OPTIONS: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	23b. If YES, number and type:
24a. GOVERNMENT PROPERTY TO BE FURNISHED? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	24b. If YES, describe (attach additional sheets, if necessary):
25a. GOVERNMENT INFORMATION TO BE PROVIDED? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	25b. If YES, describe:
26. ENVIRONMENTAL AND ENERGY CONSERVATION OBJECTIVES: N/A	
27. SECURITY CONSIDERATIONS: Flash badges issued locally should suffice for any security requirements for delivery drivers.	
28. EVALUATION FACTORS: N/A	
29. MILESTONES:	PLANNED DATE
a. Completion of acquisition package: - Purchase Request (VA Form 2237) - Statement of Need/ Statement of Work/Statement of Objectives - Specifications - Data requirements - Evaluation factors - Quality Assurance Plan	4/15/2019
b. Acquisition plan approvals	4/15/2019
c. Solicitation reviews completed	N/A
d. Issuance of combined synopsis/solicitation	N/A
e. Quotes Due	N/A
f. Evaluation of Quotes	N/A
g. Contract preparation, reviews, and clearances obtained:	4/26/2019
h. Contract Award	5/3/2019
SIGNATURES OF APPROVAL IAW - <u>VHAPM Part 807.1</u> Acquisition Planning SOP	
Program Manager Name: Bessie Gewirtz BESSIE GEWIRTZ Signature: 108176 Date: 2019.04.01 14:14:03 -04'00'	Date:
Contracting Officer Name: Andrew J. Neiss Andrew J. Neiss Signature: 198419 Date: 2019.04.01 14:17:32 -04'00'	Date:
Reviewer Name (Division Chief or Designee): Title: Signature:	Date:

For Official Use Only/Source Selection Sensitive

NAICS: 221210

2/20/2019 3:49 PM

Search Criteria

Duns	BusinessName	DbName	City	State	WebSite	ExpirationDate	Vermont in Service Area?	CNG Supply/Delivery?
808980846	ADVANCED CONSTRUCTION SERVICES INC.		Norman	Oklahoma	www.acs-ba.com	8/14/2021	Yes	No
104864809	AMK Energy Services LLC		Bountiful	Utah	www.amkenrgyservices.com	2/26/2021	Yes	No
079187529	AnClar Associates LLC		Wethersfield	Connecticut	www.ancclarassociates.com	7/6/2019	Yes	No
135020316	B&M Construction, Inc		Colorado Springs	Colorado	www.bmc-i.com	8/26/2019	No	
080006431	Brush Country Energy Solutions, LLC		Taft	Texas		4/22/2019	No	
080959544	Csrx Solutions Inc.		Tallahassee	Florida		2/1/2021	No	
079741357	Diverse Worldwide & Associates Inc		Apopka	Florida	http://diverseworldwide.com/	12/1/2019	Yes	No
788718273	DJS Construction Services, Inc.		Dublin	Georgia		1/10/2020	No	
963318857	E.C. SMITH, INC.		ANDERSON	California		1/9/2020	No	
963849240	Energi Transport LLC		Columbia	South Carolina	www.energitransport.com	9/2/2019	No	
079802214	Green Leaf Builders, Inc.		Salinas	Oklahoma		12/11/2021	No	
944162135	Ground Level Construction, Inc.		Concord	California	www.groundlevelconstruction.com	7/27/2019	No	
080667174	HALO Industries, LLC		Wilton Manors	Florida	www.haloindustriesllc.com	9/20/2020	Yes	No
080107820	Homeland Mechanical LLC		Quincy	Massachusetts	www.homelandmechanicalma.com	3/4/2019	No	
078763453	IPW Construction Group, LLC		North Charleston	South Carolina	www.ipwccg.com	9/11/2021	No	
058034691	Jackson Enterprises USA Inc		Orlando	Florida	GovFacilityManagement.com	7/26/2020	No	
079258470	Kimble's Aviation Logistical Services Inc.		Georgetown	Delaware	kimblesdls.com	1/23/2020	Yes	No
079341870	Liberty Fuel, LLC		Van Buren	Arkansas		5/2/2019	No	
080368922	Mid-Continent Group LLC		Oklahoma City	Oklahoma	mid-congroup.com	12/12/2020	No	
008638843	PowerCom Corporation		Lake Zurich	Illinois	www.powercom-corp.com	12/12/2020	No	
136200164	Randolph Joseph Williford	R. W. Project M	Mart	Texas		11/30/2020	Yes	No
187408455	RTH Mechanical Contractors, Inc.		Brentwood	New Hampshire	http://rthmechanical.com	2/20/2022	Yes	No
175224299	RTM Enterprises, Inc.		East Amherst	New York	http://www.rtmenergy.com	2/15/2022	Yes	No
831442145	SageCare, Inc.		Tampa	Florida	www.sagecarecorp.com	2/1/2022	Yes	No
039955965	Sergent's Mechanical Systems, Inc.	Sergent Constr	Oxnard	California	http://www.sergentconstructionserv	9/10/2021	No	
173056040	Storti Quality Consulting, Inc.		Willow Grove	Pennsylvania	http://www.storticonsulting.net/	4/26/2019	Yes	No
832317973	Tayrona Investments LLC	Tayrona Oil	Greenacres	Florida	http://www.Tayronausa.com	9/28/2021	Yes	No
080938279	Terraformance LLC		Las Vegas	Nevada	www.terra-formance.com	12/18/2020	Yes	No
079561660	Trident Global Solutions LLC		Scottsboro	Alabama		12/20/2020	No	
055997900	TSUNAMIHAPPY LLC.		GREENFIELD	Indiana	www.tsunamihappy.com	4/26/2019	Yes	No
040169267	US Civil & Industrial, LLC		Glendale	Arizona	www.uscivilindustrial.com	8/18/2020	No	
065625923	V. Lopez Jr and Sons General Engineering Contractors, Inc.		Santa Maria	California	www.vlopezrandsons.com	6/2/2019	No	
068209290	Williams-Sterling, Inc.		Lignum	Virginia	https://www.wsi-inc.net/	10/9/2021	No	
079862423	York Construction & Management Services, LLC.		Saint Charles	Illinois		5/15/2019	Yes	No



S--Notice of Intent to Sole Source Compressed Natural Gas (CNG) Service White River Junction VA Medical Center

Solicitation Number: NA

Agency: Department of Veterans Affairs

Office: VA National Energy Business Center

Location: VA National Energy Business Center

Notice Type:

Special Notice

Posted Date:

March 21, 2019

Response Date:

-

Archiving Policy:

Automatic, on specified date

Archive Date:

May 20, 2019

Original Set Aside:

N/A

Set Aside:

N/A

Classification Code:

S -- Utilities and housekeeping services

NAICS Code:

221 -- Utilities/221210 -- Natural Gas Distribution

Synopsis:

Added: Mar 21, 2019 3:23 pm

Page 1 of 1

Notice of Intent to Sole Source

The Department of Veteran Affairs, Program Contracting Activity Central (PCAC) intends to negotiate directly with Xpress Natural Gas LLC, a small business under North American Industrial Classification System (NAICS) code 221210 located at 300 Brickstone Square, Suite 1005, Andover, MA 01810, for the procurement compresses natural gas (CNG) service in support of an Energy Savings Performance Contract (ESPC) at the White River Junction, VT VA Medical Center under the authority of Federal Acquisition Regulation (FAR) 6.302-1, Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.

DESCRIPTION OF REQUIREMENT: The purpose of this contract is to procure CNG supply and transportation service in support of an ESPC contract that is converting the existing fuel oil-fired boiler to natural gas-fired. Due to the lack of an existing natural gas pipeline network in this geographic area, CNG was determined to be an economically viable solution.

ESPCs are a particularly unique contracting vehicle in that the Energy Service Company (ESCO) performs an Investment Grade Audit (IGA) at-risk and is not entitled to recover costs incurred (typically within a not-to-exceed amount) unless the VA moves forward with the project via a contract or task order award for implementation. The IGA results in a proposal submitted by the ESCO to the VA that, among other information, includes a 30 percent design package, a firm, fixed-price for the overall cost of the project and the guaranteed annual savings

amount the ESCO will be held to throughout the term of the contract.

In order to provide this proposal to the VA, the ESCO had to make some subcontractor selections prior to any task order being awarded for implementation. The entirety of the design for the project is dependent on the CNG solution the ESCO decides to move forward with. Without having a CNG provider selected, the ESCO would not be able to complete an acceptable 30 percent design package, and perhaps more importantly would find it problematic to come up with a guaranteed annual savings amount it will be held to throughout the term of the ESPC contract. The CNG supplier provides a turnkey solution, which includes owning and operating compression terminals at various interstate pipeline locations; owning and operating trucks and trailers necessary for CNG transport from the compression terminals to the customer s facility; and specialized, custom-built decompression equipment to be installed at the White River Junction VAMC where the gas will be decompressed and piped into the facility for use by the converted natural gas-fired boiler.

Based on the above, the ESCO conducted its own competitive selection process, and decided to select Xpress Natural Gas to be the CNG provider in order for this project to move forward. Thus, the VA intends to award a sole source contract to Xpress Natural Gas LLC for the supply and transportation of CNG effective if and when ESPC implementation phase is completed.

This notice of intent is not a request for competitive proposals, as this requirement is not available for competition. However, any responsible source who believes it is capable of meeting the requirement may submit a capability statement, proposal, or quotation, which shall be considered by the agency, only if received by the closing date and time of this notice. A determination not to compete the proposed requirement based upon the responses to this notice is solely within the discretion of the government.

Responses to this notice are due on or before April 1, 2019 at 12:00 p.m. EDT by email to andrew.neiss@va.gov.

Attachment

Type: Other (Draft RFPs/RFIs, Responses to Questions, etc..)

Posted Date: March 21, 2019

<https://www.vendorportal.ecms.va.gov/FBODocumentServer/DocumentServer.aspx?DocumentId=4846112&FileName=36E77619D0002-000.docx>

Description: 36E77619D0002 36E77619D0002.docx

Additional Info:

[Department of Veterans Affairs Homepage](#)

Contracting Office Address:

Department of Veterans Affairs;Program Contracting Activity Central;6150 Oak Tree Blvd, Suite 300;Independence OH 44131

Point of Contact(s):

Andrew Neiss

andrew.neiss@va.gov

andrew.neiss@va.gov

ALL FILES

[Attachment](#)



Mar 21, 2019

[36E77619D0002 36E77](#)

Opportunity History

- **Original Synopsis**

Mar 21, 2019

3:23 pm

Department of Veterans Affairs		SMALL BUSINESS PROGRAM AND CONTRACT BUNDLING REVIEW		OSDBU CONTROL NUMBER	
CONTRACTING ACTIVITY AND PROGRAM OFFICE DATA					
1A. CONTRACTING ACTIVITY Department of Veterans Affairs Program Contracting Activity Central			1B. ADDRESS (Include Street, City, State and Zip Code) Program Contracting Activity Central 6150 Oak Tree Blvd, Suite 300 Independence OH 44131		
1C. TELEPHONE NUMBER (Including Area Code) 216-447-8300			1D. CONTRACTING POINT OF CONTACT NAME AND EMAIL ADDRESS Andrew J. Neiss andrew.neiss@va.gov		
2A. NAME AND ADDRESS OF PROGRAM OFFICE Office of Asset Enterprise Management 810 Vermont Avenue, NW Washington DC 20420			2B. PROGRAM MANAGER NAME AND EMAIL ADDRESS Bessie (Bayla) Gewirtz bayla.gewirtz@va.gov		
			3. REVIEW TYPE <input checked="" type="checkbox"/> INITIAL <input type="checkbox"/> MODIFICATION		
PROCUREMENT DATA					
4. DESCRIPTION OF SUPPLIES OR SERVICES Supply and delivery of compressed natural gas (CNG) to the White River Junction VA Medical Center.		5. EST. DOLLAR VALUE		6A. NAICS AND SIZE STD. 221210 /1000 Employees	6B. PSC S111
		A. BASE YEAR \$826,593.08	B. TOTAL \$4,113,564.78		
7. SOLICITATION NUMBER 36E776-19-AP-0057	8. PERFORMANCE PERIOD Est. 11/1/2019 - 10/31/2024	9. EST RELEASE DATE 03-15-2019		10. EST AWARD DATE 05-03-2019	
11. PROPOSED METHOD OF PROCUREMENT (Check all that apply) <input type="checkbox"/> SDVOSB <input type="checkbox"/> HUBZONE <input type="checkbox"/> UNRESTRICTED-INSUFFICIENT SMALL BUSINESS (Attach justification) <input type="checkbox"/> VOSB <input type="checkbox"/> 8(a) <input type="checkbox"/> FEDERAL SUPPLY SCHEDULE (FSS) NAME/# _____ <input type="checkbox"/> WOSB <input checked="" type="checkbox"/> SMALL BUSINESS <input type="checkbox"/> MULTIPLE AWARD CONTRACT, TYPE/# _____ <input type="checkbox"/> EDWOSB <input type="checkbox"/> OTHER (Affiliate, Ability One, etc.) _____			<input checked="" type="checkbox"/> SOLE SOURCE <input type="checkbox"/> SET-ASIDE <input type="checkbox"/> PARTIAL SET-ASIDE		
12. MARKET RESEARCH/PUBLICATION EFFORTS <input checked="" type="checkbox"/> POSTED FCO <input type="checkbox"/> SOURCES SOUGHT <input type="checkbox"/> DSBS <input type="checkbox"/> RFI <input checked="" type="checkbox"/> FBO <input checked="" type="checkbox"/> VIP <input type="checkbox"/> GSA EBUY <input type="checkbox"/> SAM <input type="checkbox"/> FPDS			13. MARKET RESEARCH RESPONSES (Actual Number) _____ SDVOSB _____ VOSB _____ WOSB/EDWOSB _____ SDB/8a _____ HUBZONE _____ SMALL BUSINESS _____ LARGE BUSINESS _____ OTHER		
14. IPT REQUIRED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	15. PCR ASSIGNED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	16. BUNDLING CHECKLIST REQUIRED? (Attach VA Form 2268a) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		17. SUBCONTRACTING PLAN REQUIRED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
PROCUREMENT HISTORY					
18. WAS ITEM PREVIOUSLY AWARDED? <input type="checkbox"/> YES (Complete 19-23) <input checked="" type="checkbox"/> NO (Skip to item 24)	19A. CONTRACTOR NAME AND ADDRESS		19B. BUSINESS TYPE <input type="checkbox"/> SDVOSB <input type="checkbox"/> SMALL BUSINESS <input type="checkbox"/> OTHER <input type="checkbox"/> VOSB <input type="checkbox"/> WOSB <input type="checkbox"/> HUBZONE <input type="checkbox"/> SDB/8a <input type="checkbox"/> EDWOSB <input type="checkbox"/> LARGE BUSINESS		
20. DOLLAR VALUE	21. PERIOD OF PERFORMANCE	22. NAICS/SIZE STD. /		23. PROCUREMENT METHOD	
24. COMMENTS A sole source is necessary for this requirement due to it being part of an energy savings performance contract (ESPC), where the energy service company (ESCO) awarded the ESPC has already selected the company that will be providing the CNG equipment and applicable design. Thus, only this company, Xpress Natural Gas, LLC (a small business) is able to supply and deliver compressed natural gas, without jeopardizing the entire ESPC project. See market research.					
COORDINATION/CONCURRENCES					
25. CONTRACTING OFFICER (Print), SIGNATURE ANDREW J. NEISS			Andrew J. Neiss 198419 Digitally signed by Andrew J. Neiss 198419 Date: 2019.04.01 13:37:09 -04'00'		DATE SIGNED
26. HEAD OF CONTRACTING ACTIVITY (HCA) OR DELEGATE (Print), SIGNATURE RICHARD DAHMEN					DATE SIGNED
27. SMALL BUSINESS LIAISON (Print), SIGNATURE SHAUN MCWEENY			Jeremy P Gulden 194799 Digitally signed by Jeremy P Gulden 194799 Date: 2019.04.05 09:41:58 -04'00'		DATE SIGNED
28. VA OSDBU REPRESENTATIVE (Print), SIGNATURE (Attach narrative documenting reasons for non-concurrence and recommendations)			<input type="checkbox"/> CONCUR <input type="checkbox"/> NON-CONCUR		DATE SIGNED
29. SUBCONTRACTING GOALS (%) _____ SDVOSB _____ VOSB _____ HUBZONE _____ SDB _____ WOSB _____ SB					
30. NAME AND EMAIL ADDRESS OF SBA PCR (If assigned):				31. OTHER APPROVING AUTHORITY (as required):	DATE SIGNED

Attachment 2: Simplified Market Research Template

Requirement Title: Compressed Natural Gas Supply and Delivery at the White River Junction VA Medical Center

In accordance with [FAR 7.102](#), contracting officers and acquisition planners are required to perform acquisition planning and conduct market research. The following information is a summary of the acquisition planning: In submitting this request for procurement, the customer considered available sources within the agency, any government furnished information/property, and security considerations IAW VA Directive/Handbook 6500. This is a requirements-type contract, and the milestone schedule will be accomplished and documented in the Electronic Contract Management System (eCMS). The information below summarizes the market research results for this requirement.

1. Objective: [Per FAR 10.001\(a\)\(2\)](#) and [VAAR 810.001-70](#), this report is in support of (check as many as apply):

- ☒ A new requirement
- ☒ An acquisition with an estimated value in excess of the simplified acquisition threshold (see [FAR subpart 2.1](#) for current threshold)
- ☐ An acquisition with an estimated value less than the simplified acquisition threshold where adequate information is not available to develop the requirements package and the circumstances justify the cost of performing the market research;
- ☐ An acquisition that could lead to a bundled contract (15 U.S.C. 644(e)(2)(A)) (see [FAR subpart 2.1](#) for bundled contract definition);
- ☐ Other:

2. Background:

- a. Title: Compressed Natural Gas Supply and Delivery at the White River Junction VA Medical Center.
- b. [Product or Service Code](#): S111
- c. [NAICS Code](#): 221210
- d. [Size Standard for NAICS](#): 1,000 employees
- e. Estimated contract value: \$4,113,564.78

Attachment 2: Simplified Market Research Template

3. Market Research Sources: In accordance with FAR Part 10, VAAR 810 and VAAM M810, market research has been conducted for this acquisition. The following techniques were used (check as many as apply):

- ☒ Used [VA's VIP database](#) to identify verified capable SDVOSBs and VOSBs. - All results must be attached to this report.
- ☒ Applying personal knowledge in procuring supplies/services of this type.
- ☐ Contacting knowledgeable individuals in Government and industry regarding market capabilities to meet requirements.
- ☐ Reviewing the results of recent market research undertaken to meet similar or identical requirements.
- ☐ Publishing formal requests for information in appropriate technical or scientific journals or business publications.
- ☐ Querying the Government-wide database of contracts and other procurement instruments intended for use by multiple agencies available at www.contractdirectory.gov and other Government and commercial databases that provide information relevant to agency acquisitions.
- ☐ Participating in interactive, on-line communication among industry, acquisition personnel, and customers.
- ☐ Obtaining source lists of similar items from other contracting activities or agencies, trade associations or other sources.
- ☐ Reviewing catalogs and other generally available product literature published by manufacturers, distributors, and dealers or available on-line
- ☐ Conducting interchange meetings or holding presolicitation conferences to involve potential offerors early in the acquisition process.
- ☐ Conducting market survey:
- ☒ Other: Proposals received by the energy service company (ESCO) in response to a request for proposals (RFP) for this requirement.

Attachment 2: Simplified Market Research Template

4. **Market Research Findings:** This requirement is directly related to an Energy Savings Performance Contract (ESPC) that is in process at the White River Junction VAMC. An ESPC is a firm fixed-price multiyear contract with a term not to exceed 25 years for the performance of services for the design, acquisition, installation, testing, measurement and verification, and, where appropriate, operation, maintenance, repair, and replacement, of identified energy or water conservation measures. The authority for agencies to enter into these contracts is provided by 42 U.S.C. § 8287. The contractors receiving an ESPC award are referred to as ESCOs. ESCOs are responsible for financing the costs of implementing such energy or water conservation measures, and are subsequently paid via the cost savings to the agency, which must be guaranteed. The ESCO for this project is TL Services, Inc., which is a service-disabled veteran-owned small business (SDVOSB).

Typically, an ESPC project will result in decreased energy or water costs to an agency's already existing utility services. For example, lighting upgrades and solar photovoltaic (PV) systems may reduce an agency's overall electricity costs, but the agency will still continue paying electricity bills to its existing utility provider just as it has done in the past.

The ESPC project for the White River Junction VAMC consists of only one energy conservation measure: the conversion of the existing fuel oil-fired boiler to a natural gas-fired boiler. Due to the lack of a natural gas pipeline network being available, CNG was found to be a viable solution for the purpose of this project.

CNG service occurs as follows:

- The CNG supplier takes natural gas from compression terminals located on interstate pipelines and fills CNG trailers;
- The CNG is transported via these trailers to the customer;
- CNG suppliers own and install specialized decompression equipment at the customer's facility. The trailers are then connected to the decompression equipment onsite in order to provide safe, reliable natural gas. The trailers act as both transport and onsite storage.
- The CNG supplier then monitors the volumes and swaps out trailers to ensure no interruptions in service.

ESPCs are a particularly unique contracting vehicle in that the ESCOs perform the Investment Grade Audit (IGA) at-risk, and are not entitled to recover costs incurred (typically within a not-to-exceed amount) unless the VA moves forward with the project via a contract or task order award for implementation. The IGA results in a proposal submitted by the ESCO to the VA that, among other information, includes a 30 percent design package, a firm, fixed-price for the

Attachment 2: Simplified Market Research Template

overall cost of the project and the guaranteed annual savings amount the ESCO will be held to throughout the term of the contract.

In order to provide this proposal to the VA, TL Services had to make some subcontractor selections prior to any task order being awarded for implementation. As noted above, the CNG supplier provides specialized equipment to the facility, where the gas will be decompressed and piped into the facility for use by the converted natural gas-fired boiler. Without having a CNG supplier selected, TL Services would have difficulty completing an acceptable 30 percent design package, and – perhaps more importantly – would find it problematic to come up with a guaranteed annual savings amount.

TL Services, Inc. issued a request for proposal (RFP) on July 19, 2018 for compressed natural gas service. The scope of work consisted of providing pricing information for the supply and delivery of compressed natural gas, as well as the design, installation and commissioning of the decompression station to be placed onsite. The RFP was sent to the following CNG suppliers: Xpress Natural Gas LLC (XNG) and NG Advantage, LLC. These CNG suppliers currently provide similar services at nearby hospitals (non-VA), so TL Services and the VA conducted site visits to these facilities to ask questions regarding performance and overall satisfaction. Proposals were due August 2, 2018, and only one proposal was received. The proposal was submitted by XNG, and TL Services sent the proposal to the VA for review. NG Advantage, LLC fully intended to submit a proposal, but ended up passing on the opportunity due to a recent deal it made with a utility company that was going to require a significant investment in new CNG decompression equipment, and could subsequently impact its ability to meet the VA's schedule.

A call was then held with XNG, TL Services and the VA on August 3, 2018 to better understand the pricing structure of the CNG service. The same day, TL Services moved forward with a subcontractor award to XNG as the CNG service provider for this project.

Upon the anticipated award of a task order following the IGA proposal from TL Services, the VA intends to enter into a requirements-type contract with XNG for the CNG supply and delivery. Entering into a formal contract at this time is necessary so that XNG can order the necessary equipment, as some equipment has long lead times, and XNG is not going to make such an investment unless there is consideration provided by the VA. The requirements-type contract provides the consideration that, if a need arises for CNG during the agreed upon period of performance, the VA is required to purchase it from XNG.

If the VA were to conduct its own procurement to find a CNG provider at this point in the ESPC process, the entire project would be jeopardized, and would at best experience significant delays. There would also be a duplication of costs involved, since TL Services would need to revisit the project design, overall cost and guaranteed savings with the selected CNG provider. And since TL Services

Attachment 2: Simplified Market Research Template

already issued a competitive RFP for the CNG requirements, the VA would not expect to reduce any costs by conducting its own procurement. Accordingly, XNG is the only firm capable of providing the supplies and services without the VA experiencing substantial duplication of cost that could not be expected to be recovered through competition, and unacceptable delays in fulfilling its requirements.

5. Customary Commercial Practices/Standards: None.
6. Market Price: \$4,113,564.78
7. Acquisition History: None
8. Other pertinent information: As described above, the nature of the ESPC process resulted in a situation where the VA could not feasibly conduct its own procurement for this requirement, mainly due to the fact there was no requirement for the VA to take action on. Again, the IGA process is conducted at-risk by the ESCO, and requires early involvement from key subcontractors, such as the CNG provider. The need for a contract for the supply and delivery of CNG does not arise until the task order for implementation is awarded.

However, in the spirit of ensuring the contract file is documented to comply with the Veterans First Contracting Program and PPM 2016-05, the Vendor Information Pages (VIP) search results under North American Industrial Classification System (NAICS) code 221210 (natural gas distribution) – the anticipated NAICS code – are included as Attachment 1. This NAICS code was determined to be appropriate due to the fact the majority of the total cost is related to the transportation/distribution of the compressed natural gas, as opposed to the natural gas commodity itself. This cost is referred to as the “service adder,” and is estimated to be \$6.90/dekatherm. This represents roughly 67 percent of the total estimated cost. See the independent government cost estimate (IGCE) for more details. The search results indicated a total of 34 verified service-disabled veteran-owned small businesses (SDVOSBs) or veteran-owned small businesses (VOSBs) registered under NAICS code 221210. Of the 34, a total of 15 included Vermont in the company’s service area. Additional research, via the company websites provided on the VIP, was conducted for these 15 companies in order to determine if any were in the business of supplying and delivering CNG. Based on the available information, the contracting officer would not have a reasonable expectation that any could provide the supply and transportation of CNG for the White River Junction VAMC.

Additionally, a notice of intent to sole source this requirement was posted to the Federal Business Opportunities (FBO) website on March 21, 2019, with any responses due April 1, 2019 at 12:00 p.m. EDT. No responses were received. The notice of intent to sole source is included as Attachment 2.

Attachment 2: Simplified Market Research Template

9. Recommendations: Move forward with a sole source award to Xpress Natural Gas, LLC (XNG).
10. Based on the above information, the basic clauses and provisions prescribed in FAR Part 12:
- ☒ Are sufficient for use in this acquisition and do not require any tailoring to be consistent with industry's commercial practices.
 - ☐ Require tailoring to be consistent with industry's commercial practices as noted below. All such tailoring will be included in the solicitation issued for the required supplies/services.
 - Identify affected clause/provision paragraph and your recommended change(s).

Based on the above information, the following sources (minimum of three)(See [FAR subpart 8.4](#) requirements for three; different than a VA Rule of Two set-aside analysis) appear qualified and interested to fulfill this requirement:

Firm 1: Xpress Natural Gas, LLC

PREPARED BY:
NAME: Andrew J. Neiss
DATE: April 1, 2019

Andrew J.
Neiss 198419

Digitally signed by Andrew
J. Neiss 198419
Date: 2019.04.01 13:56:46
-04'00'

Attachment 1: VIP Search Results – NAICS Code 221210
Attachment 2: Notice of Intent to Sole Source

NAICS: 221210

2/20/2019 3:49 PM

Search Criteria

Duns	BusinessName	DbName	City	State	WebSite	ExpirationDate	Vermont in Service Area?	CNG Supply/Delivery?
808980846	ADVANCED CONSTRUCTION SERVICES INC.		Norman	Oklahoma	www.acs-ba.com	8/14/2021	Yes	No
104864809	AMK Energy Services LLC		Bountiful	Utah	www.amkenrgyservices.com	2/26/2021	Yes	No
079187529	AnClar Associates LLC		Wethersfield	Connecticut	www.ancclarassociates.com	7/6/2019	Yes	No
135020316	B&M Construction, Inc		Colorado Springs	Colorado	www.bmc-i.com	8/26/2019	No	
080006431	Brush Country Energy Solutions, LLC		Taft	Texas		4/22/2019	No	
080959544	Csrx Solutions Inc.		Tallahassee	Florida		2/1/2021	No	
079741357	Diverse Worldwide & Associates Inc		Apopka	Florida	http://diverseworldwide.com/	12/1/2019	Yes	No
788718273	DJS Construction Services, Inc.		Dublin	Georgia		1/10/2020	No	
963318857	E.C. SMITH, INC.		ANDERSON	California		1/9/2020	No	
963849240	Energi Transport LLC		Columbia	South Carolina	www.energitransport.com	9/2/2019	No	
079802214	Green Leaf Builders, Inc.		Salisbury	Oklahoma		12/11/2021	No	
944162135	Ground Level Construction, Inc.		Concord	California	www.groundlevelconstruction.com	7/27/2019	No	
080667174	HALO Industries, LLC		Wilton Manors	Florida	www.haloindustriesllc.com	9/20/2020	Yes	No
080107820	Homeland Mechanical LLC		Quincy	Massachusetts	www.homelandmechanicalma.com	3/4/2019	No	
078763453	IPW Construction Group, LLC		North Charleston	South Carolina	www.ipwccg.com	9/11/2021	No	
058034691	Jackson Enterprises USA Inc		Orlando	Florida	GovFacilityManagement.com	7/26/2020	No	
079258470	Kimble's Aviation Logistical Services Inc.		Georgetown	Delaware	kimblesdls.com	1/23/2020	Yes	No
079341870	Liberty Fuel, LLC		Van Buren	Arkansas		5/2/2019	No	
080368922	Mid-Continent Group LLC		Oklahoma City	Oklahoma	mid-congroup.com	12/12/2020	No	
008638843	PowerCom Corporation		Lake Zurich	Illinois	www.powercom-corp.com	12/12/2020	No	
136200164	Randolph Joseph Williford	R. W. Project M	Mart	Texas		11/30/2020	Yes	No
187408455	RTH Mechanical Contractors, Inc.		Brentwood	New Hampshire	http://rthmechanical.com	2/20/2022	Yes	No
175224299	RTM Enterprises, Inc.		East Amherst	New York	http://www.rtmenergy.com	2/15/2022	Yes	No
831442145	SageCare, Inc.		Tampa	Florida	www.sagecarecorp.com	2/1/2022	Yes	No
039955965	Sergent's Mechanical Systems, Inc.	Sergent Constr	Oxnard	California	http://www.sergentconstructionser	9/10/2021	No	
173056040	Storti Quality Consulting, Inc.		Willow Grove	Pennsylvania	http://www.storticonsulting.net/	4/26/2019	Yes	No
832317973	Tayrona Investments LLC	Tayrona Oil	Greenacres	Florida	http://www.Tayronausa.com	9/28/2021	Yes	No
080938279	Terraformance LLC		Las Vegas	Nevada	www.terra-formance.com	12/18/2020	Yes	No
079561660	Trident Global Solutions LLC		Scottsboro	Alabama		12/20/2020	No	
055997900	TSUNAMIHAPPY LLC.		GREENFIELD	Indiana	www.tsunamihappy.com	4/26/2019	Yes	No
040169267	US Civil & Industrial, LLC		Glendale	Arizona	www.uscivilindustrial.com	8/18/2020	No	
065625923	V. Lopez Jr and Sons General Engineering Contractors, Inc.		Santa Maria	California	www.vlopezrandsons.com	6/2/2019	No	
068209290	Williams-Sterling, Inc.		Lignum	Virginia	https://www.wsi-inc.net/	10/9/2021	No	
079862423	York Construction & Management Services, LLC.		Saint Charles	Illinois		5/15/2019	Yes	No



S--Notice of Intent to Sole Source Compressed Natural Gas (CNG) Service White River Junction VA Medical Center

Solicitation Number: NA

Agency: Department of Veterans Affairs

Office: VA National Energy Business Center

Location: VA National Energy Business Center

Notice Type:

Special Notice

Posted Date:

March 21, 2019

Response Date:

-

Archiving Policy:

Automatic, on specified date

Archive Date:

May 20, 2019

Original Set Aside:

N/A

Set Aside:

N/A

Classification Code:

S -- Utilities and housekeeping services

NAICS Code:

221 -- Utilities/221210 -- Natural Gas Distribution

Synopsis:

Added: Mar 21, 2019 3:23 pm

Page 1 of 1

Notice of Intent to Sole Source

The Department of Veteran Affairs, Program Contracting Activity Central (PCAC) intends to negotiate directly with Xpress Natural Gas LLC, a small business under North American Industrial Classification System (NAICS) code 221210 located at 300 Brickstone Square, Suite 1005, Andover, MA 01810, for the procurement compresses natural gas (CNG) service in support of an Energy Savings Performance Contract (ESPC) at the White River Junction, VT VA Medical Center under the authority of Federal Acquisition Regulation (FAR) 6.302-1, Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements.

DESCRIPTION OF REQUIREMENT: The purpose of this contract is to procure CNG supply and transportation service in support of an ESPC contract that is converting the existing fuel oil-fired boiler to natural gas-fired. Due to the lack of an existing natural gas pipeline network in this geographic area, CNG was determined to be an economically viable solution.

ESPCs are a particularly unique contracting vehicle in that the Energy Service Company (ESCO) performs an Investment Grade Audit (IGA) at-risk and is not entitled to recover costs incurred (typically within a not-to-exceed amount) unless the VA moves forward with the project via a contract or task order award for implementation. The IGA results in a proposal submitted by the ESCO to the VA that, among other information, includes a 30 percent design package, a firm, fixed-price for the overall cost of the project and the guaranteed annual savings

amount the ESCO will be held to throughout the term of the contract.

In order to provide this proposal to the VA, the ESCO had to make some subcontractor selections prior to any task order being awarded for implementation. The entirety of the design for the project is dependent on the CNG solution the ESCO decides to move forward with. Without having a CNG provider selected, the ESCO would not be able to complete an acceptable 30 percent design package, and perhaps more importantly would find it problematic to come up with a guaranteed annual savings amount it will be held to throughout the term of the ESPC contract. The CNG supplier provides a turnkey solution, which includes owning and operating compression terminals at various interstate pipeline locations; owning and operating trucks and trailers necessary for CNG transport from the compression terminals to the customer's facility; and specialized, custom-built decompression equipment to be installed at the White River Junction VAMC where the gas will be decompressed and piped into the facility for use by the converted natural gas-fired boiler.

Based on the above, the ESCO conducted its own competitive selection process, and decided to select Xpress Natural Gas to be the CNG provider in order for this project to move forward. Thus, the VA intends to award a sole source contract to Xpress Natural Gas LLC for the supply and transportation of CNG effective if and when ESPC implementation phase is completed.

This notice of intent is not a request for competitive proposals, as this requirement is not available for competition. However, any responsible source who believes it is capable of meeting the requirement may submit a capability statement, proposal, or quotation, which shall be considered by the agency, only if received by the closing date and time of this notice. A determination not to compete the proposed requirement based upon the responses to this notice is solely within the discretion of the government.

Responses to this notice are due on or before April 1, 2019 at 12:00 p.m. EDT by email to andrew.neiss@va.gov.

Attachment

Type: Other (Draft RFPs/RFIs, Responses to Questions, etc..)

Posted Date: March 21, 2019

<https://www.vendorportal.ecms.va.gov/FBODocumentServer/DocumentServer.aspx?DocumentId=4846112&FileName=36E77619D0002-000.docx>

Description: 36E77619D0002 36E77619D0002.docx

Additional Info:

[Department of Veterans Affairs Homepage](#)

Contracting Office Address:

Department of Veterans Affairs;Program Contracting Activity Central;6150 Oak Tree Blvd, Suite 300;Independence OH 44131

Point of Contact(s):

Andrew Neiss

andrew.neiss@va.gov

andrew.neiss@va.gov

ALL FILES

[Attachment](#)



Mar 21, 2019

[36E77619D0002 36E77](#)

Opportunity History

- **Original Synopsis**

Mar 21, 2019

3:23 pm

Department of Veterans Affairs

Memorandum

Date: February 13, 2019
From: Contracting Officer
Subj: Independent Government Cost Estimate (IGCE) for Compressed Natural Gas (CNG) at the White River Junction VA Medical Center
To: Contract File

1. The IGCE for CNG at the White River Junction VAMC for a five (5) year performance period is summarized in the table below:

	Estimated Consumption (Dth)	Estimated Total Cost
Year 1	80,199	\$826,593.08
Year 2	80,199	\$819,166.67
Year 3	80,199	\$817,888.81
Year 4	80,199	\$820,845.53
Year 5	80,199	\$829,070.69
TOTAL	400,995	\$4,113,564.78

TOTAL ESTIMATED COST: \$4,113,564.78

2. This estimate was developed using the following information:
 - (1) Quantity: Since there is no historical usage for CNG, the estimated consumption is based on the historical fuel oil usage profile, converted to the equivalent natural gas unit (Dth).
 - (2) Unit Prices: The costs were estimated using the following information:
 - a. The Henry Hub (NYMEX) futures prices for natural gas during the applicable period of performance; and
 - b. The adders and fees indicated by Xpress Natural Gas, LLC, which is the CNG provider that was selected by the Energy Services Company (ESCO), TL Services, Inc., as part of an Energy Savings Performance Contract (ESPC).
 - c. The period of performance will be five (5) years, but the start date is simply an estimate at this point, and is subject to change based on when the ESPC project is completed and commissioned.
 - d. Attachment 1 contains a detailed monthly estimate for the full period of performance, based on the above information.
3. I certify that I have conducted the appropriate market research and analysis in developing the Independent Government Cost Estimate (IGCE) for these services and that the IGCE is not based on contractor's cost/price estimate.

Andrew J. Neiss
198419
Digitally signed by
Andrew J. Neiss
198419
Date: 2019.02.13
10:19:14 -05'00'

Andrew Neiss
CONTRACTING OFFICER

Attachment 1: White River Junction CNG Detailed Estimate

White River Junction VAMC
Compressed Natural Gas (CNG) Cost Estimate
February 13, 2019

	Gas (Dth)	Henry Hub Spot Price	Marketer Adder	Wheeling Fee	Service Adder	Total Cost
Nov-19	9,220	\$ 2.845	\$ 0.50	\$ 0.10	\$ 6.90	\$ 95,382.12
Dec-19	10,681	\$ 2.985	\$ 0.50	\$ 0.10	\$ 6.90	\$ 111,990.51
Jan-20	8,981	\$ 3.073	\$ 0.50	\$ 0.10	\$ 6.90	\$ 94,961.20
Feb-20	7,556	\$ 3.015	\$ 0.50	\$ 0.10	\$ 6.90	\$ 79,451.70
Mar-20	8,568	\$ 2.917	\$ 0.50	\$ 0.10	\$ 6.90	\$ 89,250.57
Apr-20	8,282	\$ 2.602	\$ 0.50	\$ 0.10	\$ 6.90	\$ 83,662.51
May-20	3,528	\$ 2.559	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,491.18
Jun-20	3,528	\$ 2.583	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,568.87
Jul-20	4,673	\$ 2.611	\$ 0.50	\$ 0.10	\$ 6.90	\$ 47,244.58
Aug-20	4,670	\$ 2.612	\$ 0.50	\$ 0.10	\$ 6.90	\$ 47,219.84
Sep-20	3,508	\$ 2.613	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,473.01
Oct-20	7,005	\$ 2.621	\$ 0.50	\$ 0.10	\$ 6.90	\$ 70,897.00
Nov-20	9,220	\$ 2.667	\$ 0.50	\$ 0.10	\$ 6.90	\$ 93,740.94
Dec-20	10,681	\$ 2.828	\$ 0.50	\$ 0.10	\$ 6.90	\$ 110,313.59
Jan-21	8,981	\$ 2.963	\$ 0.50	\$ 0.10	\$ 6.90	\$ 93,973.24
Feb-21	7,556	\$ 2.903	\$ 0.50	\$ 0.10	\$ 6.90	\$ 78,605.42
Mar-21	8,568	\$ 2.751	\$ 0.50	\$ 0.10	\$ 6.90	\$ 87,828.32
Apr-21	8,282	\$ 2.493	\$ 0.50	\$ 0.10	\$ 6.90	\$ 82,759.80
May-21	3,528	\$ 2.462	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,148.93
Jun-21	3,528	\$ 2.499	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,272.55
Jul-21	4,673	\$ 2.537	\$ 0.50	\$ 0.10	\$ 6.90	\$ 46,898.80
Aug-21	4,670	\$ 2.551	\$ 0.50	\$ 0.10	\$ 6.90	\$ 46,934.99
Sep-21	3,508	\$ 2.546	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,237.99
Oct-21	7,005	\$ 2.843	\$ 0.50	\$ 0.10	\$ 6.90	\$ 72,452.10
Nov-21	9,220	\$ 2.638	\$ 0.50	\$ 0.10	\$ 6.90	\$ 93,473.55
Dec-21	10,681	\$ 2.824	\$ 0.50	\$ 0.10	\$ 6.90	\$ 110,270.86
Jan-22	8,981	\$ 2.944	\$ 0.50	\$ 0.10	\$ 6.90	\$ 93,802.59
Feb-22	7,556	\$ 2.894	\$ 0.50	\$ 0.10	\$ 6.90	\$ 78,537.42
Mar-22	8,568	\$ 2.770	\$ 0.50	\$ 0.10	\$ 6.90	\$ 87,991.10
Apr-22	8,282	\$ 2.530	\$ 0.50	\$ 0.10	\$ 6.90	\$ 83,066.22
May-22	3,528	\$ 2.490	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,247.72
Jun-22	3,528	\$ 2.537	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,406.60
Jul-22	4,673	\$ 2.569	\$ 0.50	\$ 0.10	\$ 6.90	\$ 47,048.33
Aug-22	4,670	\$ 2.574	\$ 0.50	\$ 0.10	\$ 6.90	\$ 47,042.39
Sep-22	3,508	\$ 2.568	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,315.16
Oct-22	7,005	\$ 2.591	\$ 0.50	\$ 0.10	\$ 6.90	\$ 70,686.85
Nov-22	9,220	\$ 2.656	\$ 0.50	\$ 0.10	\$ 6.90	\$ 93,639.52
Dec-22	10,681	\$ 2.821	\$ 0.50	\$ 0.10	\$ 6.90	\$ 110,238.82
Jan-23	8,981	\$ 2.943	\$ 0.50	\$ 0.10	\$ 6.90	\$ 93,793.61
Feb-23	7,556	\$ 2.893	\$ 0.50	\$ 0.10	\$ 6.90	\$ 78,529.86
Mar-23	8,568	\$ 2.793	\$ 0.50	\$ 0.10	\$ 6.90	\$ 88,188.16
Apr-23	8,282	\$ 2.568	\$ 0.50	\$ 0.10	\$ 6.90	\$ 83,380.93
May-23	3,528	\$ 2.565	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,512.35
Jun-23	3,528	\$ 2.603	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,639.42
Jul-23	4,673	\$ 2.643	\$ 0.50	\$ 0.10	\$ 6.90	\$ 47,394.10
Aug-23	4,670	\$ 2.663	\$ 0.50	\$ 0.10	\$ 6.90	\$ 47,457.99
Sep-23	3,508	\$ 2.665	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,655.40
Oct-23	7,005	\$ 2.695	\$ 0.50	\$ 0.10	\$ 6.90	\$ 71,415.37
Nov-23	9,220	\$ 2.761	\$ 0.50	\$ 0.10	\$ 6.90	\$ 94,607.63
Dec-23	10,681	\$ 2.924	\$ 0.50	\$ 0.10	\$ 6.90	\$ 111,338.96
Jan-24	8,981	\$ 3.048	\$ 0.50	\$ 0.10	\$ 6.90	\$ 94,736.67
Feb-24	7,556	\$ 3.008	\$ 0.50	\$ 0.10	\$ 6.90	\$ 79,398.81
Mar-24	8,568	\$ 2.915	\$ 0.50	\$ 0.10	\$ 6.90	\$ 89,233.43
Apr-24	8,282	\$ 2.680	\$ 0.50	\$ 0.10	\$ 6.90	\$ 84,308.49
May-24	3,528	\$ 2.665	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,865.18
Jun-24	3,528	\$ 2.696	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,967.49
Jul-24	4,673	\$ 2.730	\$ 0.50	\$ 0.10	\$ 6.90	\$ 47,800.61
Aug-24	4,670	\$ 2.749	\$ 0.50	\$ 0.10	\$ 6.90	\$ 47,859.58
Sep-24	3,508	\$ 2.751	\$ 0.50	\$ 0.10	\$ 6.90	\$ 35,957.06
Oct-24	7,005	\$ 2.778	\$ 0.50	\$ 0.10	\$ 6.90	\$ 71,996.78
TOTAL	400,995					\$ 4,113,564.78