DEPARTMENT OF THE NAVY

REGIONAL CONTRACTING DEPARTMENT
NAVSUP FLEET LOGISTICS CENTER PUGET SOUND
467 W STREET
BREMERTON, WASHINGTON 98314-5120

CONTROL NUMBER 2016-026

N00406-11-D-1258-000801

LIMITED SOURCE JUSTIFICATION
FOR AN EXCEPTION TO FAIR OPPORTUNITY
(MAC ORDER >$3,000 but not exceeding the SAT)

1. **Contracting Activity**.

NAVSUP Fleet Logistics Center Puget Sound

2. **Description of Action Being Approved**.

This acquisition is conducted under the authority of 10 U.S.C. 2304(a) through 2304(d). This is a limited source action in the estimated amount of [redacted] (b) (5) to be awarded as a modification of an existing order to Puglia Engineering, Inc. using FY16 O&MN funds.

3. **Description of Supplies/Services**.

This requirement is for service craft repair of Fuel Oil Compensating Barge IX-550 in support of Commander Navy Region Northwest, Port Operations Department. The procurement was for towing from and delivery to Naval Station Everett. Remove existing steel piping on main deck and install copper nickel piping. Sweep blast clean and preserve new cargo piping. Work performed shall be in accordance with the statement of work. The period of performance is from 1 September 2015 through 8 April 2016. The order to be modified was issued under a multiple award, indefinite delivery, indefinite quantity contract vehicle with six awardees for preserving, maintaining, and repairing small craft floating assets in support of Navy Region Northwest Port Operations Department.

4. **Statutory Authority Permitting Exception to Fair Opportunity**.

10 U.S.C. 2304(c), as implemented by FAR 16.505(b)(2).

5. **Rationale Justifying Use of Cited Statutory Authority.**

The order must be issued on a sole-source basis in the interest of economy and efficiency because it is a logical follow-on to an order already issued under the contract, provided that all awardees were given a fair opportunity to be considered for the original order. The requirement for piping repair service of Fuel Oil Compensating Barge IX-550 was competed among all six MAC awardees and awarded on 1 September 2015 to Puglia Engineering, Inc. as task order N00406-11-D-1258-0008. Condition found reports submitted under task order 0008 identified additional piping replacement work to be performed and procured from Puglia Engineering. A hole in the 8 inch diameter stripping line piping, which is outside the scope of the original task order, has to be repaired by replacing the damage section to restore the piping integrity of the barge. Award of the identified additional work to any other source would result in substantial duplication of towing and transportation cost to the Government that is not expected to be recovered through competition. Furthermore, award of the identified additional work to any other source would cause unacceptable delays in fulfilling the Government's requirements, and the IX-550 barge is currently at Puglia's facility whereas it would not be practical to allow another contractor to work on the same site.

6. **Determination of Fair and Reasonable Cost.**

Task order 0008 pricing was determined fair and reasonable at time of award based on comparison of proposed prices with independent Government cost estimates (IGE) per FAR 15.404-1(b)(2)(v), and based on comparison of proposed prices to historical prices paid per FAR 15.404-1(b)(2)(ii). The contracting officer has determined the anticipated cost to the Government of the services covered by this LSJ will be fair and reasonable utilizing the appropriate methodology for the contract type.

7. **Actions to Remove Barriers to Future Competition.**

This action is a logical follow-on to an order already issued that was competed amongst the six MAC awardees. All future task order requirements will continue to be competed.

8. **Contracting Point of Contact:**

The contracting points of contact for this action are Edwin Baldoria, NAVSUP FLC Puget Sound Contracting Officer, 360-476-2812, edwin.baldoria@navy.mil and David Stokes, NAVSUP FLC Puget Sound Contracting Officer, 360-476-8020, david.stokes@navy.mil.

LSJ Number: 2016-026

CERTIFICATIONS AND APPROVAL

TECHNICAL/REQUIREMENTS CERTIFICATION

I certify that the facts and representations under my cognizance which are included in this Justification and its supporting acquisition planning documents, except as noted herein, are complete and accurate to the best of my knowledge and belief.

[redacted] (b) (6)

Cognizance:

Name (Printed)	Phone No.	Date
MARK ACRES	(360) 476-4073	3-1-16

LEGAL SUFFICIENCY REVIEW

[redacted] (b) (6) Justification is legally sufficient.

Name (Printed)	Phone No.	Date
Chris Lyback	360-476-2988	3/2/16

CONTRACTING OFFICER CERTIFICATION

I certify that this Justification is accurate and complete to the best of my knowledge and belief. To the extent that the J&A/LSJ value is between $150K and $650K, the Contracting Officer's signature below also represents approval of the J&A/LSJ.

[redacted]

Name (Printed)	Phone No.	Date
BALDORIA	360 476 2812	3/2/16