

Department of Energy
Build America, Buy America Act
Proposed Project-Specific Non-availability Waiver
For Advance Metering Infrastructure (AMI) Technologies

Proposed Waiver Summary: The United States Department of Energy (DOE) Office of Electricity is issuing a project specific nonavailability waiver of the manufactured products domestic preference requirements of section 70914 of the Build America, Buy America Act (BABA) included in the Infrastructure Investment and Jobs Act (Pub. L. No. 117-58) as applied to one federal financial assistance award to the State of Wisconsin. This proposed limited nonavailability waiver allows the recipient/sub-recipient to purchase non-compliant Advance Metering Infrastructure (AMI) technologies.

Duration of the Waiver: The effective date of this waiver is from date of issue through the project performance period (estimated December 2028).

Applicability: The waiver will apply to eligible expenditures incurred by the recipient on or after the effective date of the final waiver for the period that the waiver is active.

Recipient: State of Wisconsin (LLEGE1GMNM8)

Sub-Recipient: City of Arcadia (J6EYWJAGKGM7)

Total estimated project cost related to infrastructure: \$352,484.00

Waiver Type: Non-availability waiver of the BABA manufactured products requirement for the products listed below.

Waiver Level: Project-specific waiver for one sub-award.

Funding Mechanics: Funding for the infrastructure project is made available through the Funding Opportunity Announcement Infrastructure Investment and Jobs Act (IIJA) - Preventing Outages and Enhancing the Resilience of the Electric Grid Formula Grants to States and Indian Tribes (DE-FOA-0002736). The project installations will take place in various locations within the city of Arcadia, Wisconsin.

Description of Covered Items:

- Residential Smart Meters:
 - HRCWB50GB0010 - A4R - Form 2S cl200, 120-240v – Mesh (PSC: 5975; NAICS: 221122)
 - 2 HRCWB5BGB0010 - A4R - Form 2S cl200, 120-240v – Mesh - Service Disconnect (PSC: 5975; NAICS: 221122)

- 3 HRC2B50GB0010 - A4R - Form 4S c120, 120-240v – Mesh (PSC: 5975; NAICS: 221122)
- 5 HR5WB5BGB0010 - A4R - Form 12S c1200, 120-240v – Mesh - Service Disconnect (PSC: 5975; NAICS: 221122)
- Commercial Smart Meters:
 - 6 HC32A30GB0R00 - A4CI - Form 9S c120, 120-480v – Mesh (PSC: 5975; NAICS: 221122)
 - 7 HC3WA30GB0R00 - A4CI - Form 16S c1200, 120-480v – Mesh (PSC: 5975; NAICS: 221122)

Description of Market Research and Justification: The recipient conducted market research and also released an RFP in October 2024 to determine if domestically sourced AMI meters and associated components would be available for their project needs. After a comprehensive search, it was determined that no AMI Electric Meter Vendors offered a BABA Compliant AMI/Smart meter that would work for the needs of their project.

DOE completed market research from September 2025 – December 2025. Drawing on responses from leading AMI suppliers to a recent market survey (regarding product content and BABA compliance) - none of the surveyed manufacturers are currently able to comply with BABA content requirements. Most of the respondents' AMI material and equipment—meters, modules, and network devices—are built or assembled in Mexico, Thailand, the Philippines, India, Canada, with some content in the United States. Foreign manufacturers dominate the supply of critical components - printed circuit boards (PCBs), liquid crystal displays (LCDs), and metrology electronics - making BABA compliance unachievable for the respective U.S. meter products. The manufacturer-volunteered estimates of their respective U.S. content ranged from less than 5% up to about 15%, depending on supplier and their specific models. The most expensive components of leading U.S. AMI power meters (endpoints, resins, printed circuit boards, meter electronics and batteries), are manufactured and assembled outside of the U.S. While there was a single domestic source found producing AMI smart meters, it was determined that it is not suitable for the use case defined in this project. This industrial-grade, domestic product is used most notably at grid interconnection points such as substations, transmission, and distribution interfaces.

Impact Absent the waiver: If a BABA waiver is not issued for the Honeywell meters that technologically integrate with WPPI's systems, the recipient would have to abandon the project or settle for unfamiliar meters that would compromise valuable customer information.

Assessment of Cost Advantage of a Foreign-Sourced Product: Under OMB M–24–02, agencies are expected to assess “whether a significant portion of any cost advantage of a foreign-sourced product is the result of the use of dumped steel, iron, or manufactured products or the use of injuriously subsidized steel, iron, or manufactured products” as appropriate before granting a nonavailability waiver. DOE's analysis has concluded that this assessment is not applicable to this waiver as this waiver is not based on the cost of foreign-sourced products.

Solicitation for Comments: DOE is seeking public comments for all interested parties, including industry members and current manufactures of the covered AMI product items listed above, regarding the potential availability of project-compliant products from domestic manufacturers. The proposed waiver is available for public comment for fifteen (15) calendar days. **Comments are due no later than Month Day, Year**, and must be submitted by email to the DOE Contracting Officer at **BABAWaiverComment@netl.doe.gov**. Please write “BABA WAV 2026-## - Wisconsin – City of Arcadia” in the subject line of the email.