

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 Illinois Finance Authority. This proposed limited nonavailability waiver allows the recipient/sub-recipients 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 2030).

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: Illinois Finance Authority (RBHJRALA6356)

Sub-Recipients:

- Southern Illinois Electric Cooperative (SIEC) (M9WJJP7H3NK1)
- Adams Electric Cooperative (R7L5N6S5HXS7)
- Tri-County Electric Coop (TCEC) (WXV8F8LZDZY5)

Total estimated project cost related to infrastructure: \$4,347,873 (SIEC) + \$5,175,289 (AEC) + \$3,741,376 (TCEC) = **\$13,264,538**

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

Waiver Level: Project-specific waiver for three sub-awards.

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 various locations of this project are Adams, Alexander, Brown, Fulton, Hancock, Jackson, Jefferson, Johnson, Marion, Massac, McDonough, Pike, Pope, Pulaski, Schuyler, Union, Washington, and Williamson Counties in Illinois.

Description of Covered Items:

- SIEC: Landis + Gyr AMI 2.0 Revelo Electric Meters, Landis+Gyr Network Gateway, Landis + Gyr RF Router and Kit with 20-Foot Cable, Landis+Gyr Gridstream Mobile Radio (GMR), and minor associated components
- Adams Electric Cooperative: Multiple types: Sensus Status IQ Electric Meters, Multiple types: Aclara KV2C Meter w/ Radio Switches, and minor associated components
- TCEC: Sensus Stratus IQ +Single Phase Meter with FlexNet Communications Board, Sensus Aclara kV2c Three-phase meter with FlexNet communications board, and minor associated components

This technology falls under:

- NAICS: 334515, 2211, 22112, and 221122
- PSC: 13, 13.3, 59, 5935, 5940, 5998, 5999, 6021, 6032, 6060, 6099, 6140, 6150, 6160, 6625, 7G21, 7G22, and 7J20.

Description of Market Research and Justification: Illinois Finance Authority market research for this waiver relies on the research conducted by the IFA 40101d Program applicant, TCEC, and the recent US EPA and US DOI joint non-availability AMI Meter waiver in effort to confirm nonavailability of related American manufactured AMI equipment in the US. SIEC, Adams Electric Cooperative, and TCEC completed exhaustive due diligence activities to find domestically manufactured products. After extensive outreach, the subrecipients determined that no domestic manufacturers were able to provide the materials necessary to meet BABA requirements for all products specified in this waiver request. The subrecipients considered multiple manufacturers that offer meters with required specifications (Aclara, Tantalus, and Itron) and reached out to the Illinois Manufacturing Excellence Center (IMEC) but unfortunately no BABA compliant AMI equipment could be identified.

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: Without the requested waiver, Illinois Finance Authority will not be able to provide funding to projects that intend to upgrade to the AMI equipment due to the unavailability of the domestically manufactured AMI equipment that meets project requirements, and these projects will not move forward. This will greatly impact these electric cooperative's ability to upgrade their infrastructure in an effective and affordable way that can greatly improve their ability to track and prevent outages, reduce outage restoration time for their customers, and offer potential energy cost savings to customers. Without 40101d funding, many small utilities will not modernize their equipment because it is too expensive and cumbersome to undertake such projects on their own due to limited resources and the desire to protect their customers from electric rate increases.

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-## - Illinois – Multiple Subrecipients” in the subject line of the email.