

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) Grid Deployment Office 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 Iowa Economic Development Authority. 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 (until December 2027).

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: Iowa Economic Development Authority (GLJLA2WMK5P3)

Sub-Recipient: City of Estherville, Iowa (Q2N3NMRN48X3)

Total estimated project cost related to infrastructure: \$1,800,002

Estimated total cost of the products being waived: \$824,050

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 FY22, FY23, and FY24 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 location of the project is the City of Estherville, Iowa.

Description of Covered Items:

- Residential single phase electric meter (NAICS: 334515, PSC: 6625)
 - Residential polyphase electric meter (NAICS: 334515, PSC: 6625)
 - Load Management devices (NAICS: 334515, PSC: 6625) - Base station/collector (NAICS: 334515, PSC: 6625)
- Description of Market Research and Justification:** The recipient, in conjunction with technical assistance provided by the Grid Deployment Office (GDO), conducted market research and outreach from June 2025 – September

2025 to determine if domestically sourced AMI meters would be available for their project needs. Several vendors were contacted via email, determining that there were no suitable domestic options that were suited for residential needs.

DOE completed market research from September 2025 – October 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: Absent this waiver, this project would not be able to be completed given that the AMI meters and the associated components are the key infrastructure components of the project. Without the meters, there would not be a project.

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.

Summary of Public Comments The proposed waiver request was publicly posted by the Department of Energy for comments during the period of February 5, 2026, through February 20, 2026. No comments were received from the public, and therefore no substantive changes were made in response.