

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 (OE) 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-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 April 2032).

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-Recipient: Menard Electric Cooperative (MEC) (JTRNKDDHJ3A7)

Total estimated project cost related to infrastructure: \$362,253

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 location of the project is within Sangamon, Menard and Logan counties in Illinois.

Description of Covered Items:

- AMI 2.0 Residential Meters Revelo E360 1S*
- AMI 2.0 Residential Meters Revelo E360 2S*
- AMI 2.0 Residential Meters Revelo E360 2SE*
- AMI 2.0 Residential Meters Revelo E360 12S*
- AMI 2.0 C&I Meters Revelo E360 1S thru 16S*
- Network Gateway 1 Radio

- Gateway 1 Radio Install Kit (includes default 10-foot power cable, 1 series 5 radio, 1 cellular modem, utility pole mounting kit)
- RF Router
- RF Router Install Kits with 20-foot cable
- Gridstream Mobile Radio

PSC: 59, 5935, 5998, 5999, 6021, 6032, 6060, 6099, 6140, 6150, 6160, 7G22, 7J20

NAICS: 2211, 221, 221122

*Including meter bodies, end points / transmitters, mounting equipment, collectors, baseplates, printed circuit boards, baseplates, repeaters, housing, and associated equipment.

Description of Market Research and Justification: The recipient completed exhaustive market research from March 2026 to April 2026 and determined that there are currently no domestically manufactured electric meters of this type available that meet the required specifications. Despite outreach to multiple suppliers and consultation with the Illinois Manufacturing Excellence Center (IMEC) for supplier scouting assistance, no domestic manufacturers or component suppliers were identified. Therefore, these specific non-domestic products are essential to ensure project viability, compatibility with project planned AMI system design, and compliance with operational and cybersecurity standards required for utility-grade metering equipment.

DOE completed market research from May 2026 – June 2026. The U.S. Advanced Metering Infrastructure (AMI) market is driven by regulatory requirements, utility modernization initiatives, grid resiliency objectives, and growing demand for real-time energy data. AMI systems enable remote meter reading, outage detection, voltage monitoring, demand response, and grid analytics, making them foundational components of modern electric utility operations. Smart meters equipped with advanced communications, cybersecurity, and distributed intelligence (DI) capabilities allow utilities to improve reliability, operational efficiency, wildfire mitigation, and customer service.

Menard Electric Cooperative's (MEC) project requires AMI meters that are compatible with its existing communications network and support advanced DI applications. AMI meters with distributed intelligence functionality represent the next generation of smart metering technology. Unlike traditional AMI devices that primarily transmit data to centralized utility systems, DI-enabled meters perform edge computing and local analytics directly at the meter. AMI 2.0 meters are widely adopted utility meter configurations used throughout the electric utility industry. Market research conducted by MEC and reviewed by DOE indicates these products rely upon globally sourced electronic components and currently do not satisfy the domestic content requirements.

While the chosen 2.0 meters are the MEC project's primary metering device, supporting materials listed in the waiver support AMI communications and network infrastructure. The specific access points and relay devices are directly associated with meter-to-network

communications, providing backhaul communications, routing, and cybersecurity functions necessary for operation of the overall AMI system, and not compliant.

MEC's findings are consistent with broader federal market research and previous AMI-related waiver determinations.

While one U.S.-based manufacturer reportedly offers a BABA-compliant smart metering solution, the product is designed primarily for specialized industrial and substation applications. Consequently, no commercially viable, BABA-compliant alternative has been identified that satisfies MEC's technical, operational, interoperability, and economic requirement.

Impact Absent the waiver: Without the requested waiver, IFA 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 MEC and other rural electric cooperatives and municipal utilities' 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 manufacturers of the covered 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 – Menard Electric Cooperative” in the subject line of the email.