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10 **OFFICE OF THE PUBLIC AUDITOR**
11 **PROCUREMENT APPEALS**

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13 IN THE APPEAL OF) **DOCKET NO. OPA-PA-14-008**
14)
15 IP&E HOLDINGS, LLC) **APPELLEE'S LIST OF ISSUES**
16)
17 Appellant.)
18 _____)
19
20

21 **COMES NOW**, the GUAM POWER AUTHORITY, by and through its counsel of
22 record, D. GRAHAM BOTHA, ESQ., and submits its List of Issues for the October 6, 2014,
23 hearing as follows:
24

- 25 1. Did Guam Power Authority ("GPA") properly select the lowest responsive bidder with
26 the selection of Mobil for four locations and IP&E for one location?
27 2. Did GPA properly award the contract based on Section 2.13 which states that the
28 contract will be awarded in whole **or in per plant** location to the bidder evaluated as being
29 qualified and with the best-price proposal?
30 3. Did GPA properly award to multiple bidders based on the evaluation criteria contained
31 in the IFB?

32 **RESPECTFULLY SUBMITTED** this 24th day of September, 2014.

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35 D. GRAHAM BOTHA, ESQ.
36 GPA Legal Counsel
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ORIGINAL