D. GRAHAM BOTHA, ESQ. GPA General Counsel Guam Power Authority 688 Route 15, Suite 302 Mangilao, Guam 96913

Tel.: (671) 648-3203/3002

Fax: (671) 648-3290

OFFICE OF PUBLIC ACCOUNTABILITY
PROCUREMENT APPEALS
DATE: 7/12/2021
TIME: 1:30 CIAM EPM BY: (MY

FILE NO OPA-PA:

Attorney for the Guam Power Authority

OFFICE OF THE PUBLIC AUDITOR PROCUREMENT APPEALS

IN THE APPEAL OF)) DOCKET NO. OPA-PA-21-002
Track Me Guam, LLC dba: TrackMe! Guam))	PROCUREMENT RECORD HEARING REQUEST
Appellant.))	

COMES NOW, D. GRAHAM BOTHA, ESQ., and hereby submits the Procurement Record in this matter on behalf of appellee, GUAM POWER AUTHORITY (GPA). Pursuant to 2 GAR §12108(a), GPA hereby requests a hearing on the appeal stated above. Counsel requests that all further documents in this appeal be servedupon GPA's counsel of record.

RESPECTFULLY SUBMITTED this 09th day of July, 2021.

D. GRAHAM BOTHA, ESQ. GPA General Counsel

OPA PA-21-002

Invitation for Bid No.: GPA-024-21

Fleet and Fuel Management Software Services for the Authority's Fleet

TABLE OF CONTENTS OPA PA-21-002

- Tab 1: Email correspondence dated July 02, 2021, Office of the Attorney General's acknowledgment of Stay of Procurement letters and Notice of Receipt of Appeal, Ref.: OPA-PA-21-002
- Tab 2: Email correspondence dated July 02, 2021, Track Me! Guam's acknowledgement of Stay of Procurement Letter
- Tab 3: Email correspondence dated July 02, 2021, PTI Pacific Inc. dba IT&E's acknowledgement of Stay of Procurement letter
- Tab 4: Email correspondence, memorandums to GPA Staff Attorney, Attorney General and letters to bidders notifying of Stay of Procurement resulting the Notice of Receipt of Appeal, Ref.: OPA-PA-21-002 by Track Mel Guam
- Tab 5: Email correspondence dated July 01, 2021, acknowledgement of the Notice of Receipt of Appeal, Ref.: OPA-PA-21-002
- Tab 6: Office of Public Accountability Notice of Receipt of Appeal, OPA PA-21-002 dated July 01, 2021
- Tab 7: Receipt of Razzano Walsh & Torres, P.C.'s Procurement Appeal of Denial of Procurement Protest in the Office of Public Accountability dated July 01, 2021
- Tab 8: Email correspondence dated June 30, 2021, Attorney General's acknowledgement of Lift of Stay Memorandums to GPA Staff Attorney, Attorney General and Lift of Stay Notice to bidders
- Tab 9: Official Receipt dated June 24, 2021, Razzano Walsh & Torres, P.C. Freedom of Information Act (FOIA) request dated June 18, 2021
- Tab 10: Email correspondence dated June 23, 2021, Track Me! Guam's acknowledgement of Denial of Procurement Protest letter
- Tab 11: PTI Pacifica Inc. dba IT&E's acknowledgement of Lift of Stay letter dated June 16, 2021
- Tab 12: Email correspondence dated June 16, 2021, memorandums to GPA Staff Attorney, Attorney General and Letters to bidders notifying of Lift of Stay of Procurement
- Tab 13: Bid Committee's review of Track Me! Guam's Bid Protest Supplement dated April 08, 2021
- Tab 14: Email correspondence dated April 06, 2021 from GPA Staff Attorney in response to Track Me! Guam's Bid Protest Supplement letter
- Tab 15: Email correspondence dated April 06, 2021 to GPA Staff Attorney for review and guidance of Track Me!

 Guam's Bid Protest Supplement letter
- Tab 16: Receipt of Track Me! Guam's Bid Protest Supplement letter dated April 06, 2021

TABLE OF CONTENTS A

- Tab 17: Email correspondence dated April 06, 2021 to GPA Staff Attorney for review of PTI Pacifica Inc. dba IT&E's Bid Protest Response letter relative to Track Me! Guam's protest letter dated March 16, 2021
- Tab 18: Official Receipt dated March 25, 2021, Track Me! Guam LLC dba Track Me! Guam's Freedom of Information Act (FOIA) request dated March 12, 2021

*** END OF BINDER 1 ****

TABLE OF CONTENTS OPA PA-21-002

- Tab 19: Official Receipt dated March 23, 2021, PTI Pacific Inc. dba IT&E's Freedom of Information Act (FOIA) request dated March 16, 2021
- Tab 20: Email correspondence dated March 17, 2021, Track Me! Guam's acknowledgement of Stay of Procurement
- Tab 21: Email correspondence dated March 16, 2021, Attorney General's acknowledgement of Stay of Procurement memorandums to GPA Staff Attorney, Attorney General and Notice to bidders
- Tab 22: Email correspondence dated March 16, 2021, PTI Pacific Inc. dba IT&E's acknowledgement of Stay of Procurement
- Tab 23: Email correspondence dated March 16, 2021 to GPA Staff Attorney, Attorney General and Notice to Bidders of Stay of Procurement resulting Track Me! Guam's Bid Protest letter dated March 12, 2021
- Tab 24: Receipt of Track Me! Guam's Bid Protest, Notice of Trigger for Automatic Stay, and Sunshine Act Request Memo dated March 12, 2021
- Tab 25: Certification of Completed Procurement Record for GPA-024-21
- Tab 26: Analysis on Invitation for Bid No.: GPA-024-21 for Fleet and Fuel Management Software Services for the Authority's Fleet
- Tab 27: Email correspondence dated March 11, 2021 PTI Pacifica Inc. dba IT&E's acknowledgement of Notice of Intent letter dated March 08, 2021
- Tab 28: Email correspondence dated March 05, 2021 from Track Me! Guam regarding concerns about PTI Pacific Inc. dba IT&E's bid offer
- Tab 29: Bid Committee Recommendation memo dated February 22, 2021

*** END OF BINDER 2 ****

TABLE OF CONTENTS OPA PA-21-002

- Tab 30: Email correspondence dated February 22, 2021, PTI Pacifica Inc. dba IT&E's clarification response letter dated February 22, 2021
- Tab 31: Email correspondence dated February 19, 2021, Clarification letter to PTI Pacifica Inc. dba IT&E
- Tab 32: Email correspondence dated February 19, 2021 from Bid Committee Clarification for PTI Pacific Inc. dba IT&E
- Tab 33: Email correspondence dated February 11, 2021, PTI Pacifica Inc. dba IT&E's clarification response letter dated February 11, 2021
- Tab 34: Email correspondence dated February 10, 2021 from Track Me! Guam's letter of concern
- Tab 35: Email correspondence dated February 09, 2021, Clarification letter to PTI Pacifica Inc. dba IT&E
- Tab 36: Email correspondence dated February 09, 2021 from Bid Committee Clarification for PTI Pacific Inc. dba
- Tab 37: Committee Selection memo dated January 29, 2021 for GPA-024-21
- Tab 38: PTI Pacifica Inc. dba IT&E's bid submission for GPA-024-21
- Tab 39: Track Me! Guam's bid submission for GPA-024-21
- Tab 40: Abstract of Bids for GPA-024-21.
- Tab 41: Email correspondence dated January 28, 2021, PTI Pacifica Inc. dba IT&E's acknowledgement of Amendment No.: I
- Tab 42: Non-Mandatory Site Inspection attendance sheet for GPA-024-21
- Tab 43: Email correspondence dated January 21, 2021, Track Me! Guam's acknowledgement of Amendment No.: II
- Tab 44: Email correspondence dated January 21, 2021, PTI Pacifica Inc. dba IT&E's acknowledgement of Amendment No.: II
- Tab 45: Email correspondence dated January 20, 2021, Bid Committee's response to PTI Pacifica Inc. dba IT&E Inquiry
- Tab 46: PTI Pacifica Inc. dba IT&E's inquiry dated January 19, 2021
- Tab 47: Email correspondence dated January 15, 2021, Track Me! Guam's acknowledgement of Amendment No.: I
- Tab 48: Email correspondence dated January 13, 2021, Bid Committee's response to Track Me! Guam's Inquiry

TABLE OF CONTENTS OPA PA-21-002

Tab 49: Invitation for Bid Package No.: GPA-024-21

Tab 50: Bid Advertisement with Pacific Daily News and The Guam Daily Post

Tab 51: Planned Procurement memo dated December 19, 2020

*** END OF BINDER 3 ****