



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

EXECUTIVE OFFICE

June 4, 2015

In reply refer to: A-7

MEMORANDUM FOR ELLIOT E. MAINZER, ADMINISTRATOR and CHIEF EXECUTIVE OFFICER,
BONNEVILLE POWER ADMINISTRATION

THROUGH:

CLAUDIA R. ANDREWS

CHIEF OPERATING OFFICER, BONNEVILLE POWER ADMINISTRATION

THOMAS A. MCDONALD

CHIEF COMPLIANCE OFFICER, COMPLIANCE AND GOVERNANCE (ACTING),
BONNEVILLE POWER ADMINISTRATION

FROM:

LARRY D. BUTTRESS

CHIEF INFORMATION OFFICER, BONNEVILLE POWER ADMINISTRATION

SUBJECT:

DIRECTIVES EQUIVALENCY APPROVAL MEMORANDUM

PURPOSE: To document BPA's equivalencies for some sections of DOE Order 200.1A, *Information Technology Management*.

BACKGROUND: BPA has traditionally followed DOE Order 200.1A although it is excluded from some sections as stated in section 3c(2) of the order. BPA is excluded from sections 1a(2), 4a(2), 1a(4), and 4a(4). In addition, BPA has equivalent requirements to Attachment 1, the Contractor Requirements Document. This memo documents the rationale for this exclusion and describes the equivalencies that exist to assure that BPA is following all applicable laws and regulations.


JUSTIFICATION: BPA's relationship with contractors is markedly different than the relationship DOE has with its Management and Operating contractors as defined in the Federal Acquisition Requirements Subpart 17.6-Management and Operating Contracts. BPA is granted independent contracting authority pursuant to the Bonneville Project Act of 1937 (16 U.S.C. § 832a(f)) and is exempt from the Federal Acquisition Regulations (FAR) pursuant to the Federal Property and Administrative Services Act of 1939. As such BPA does not utilize Contract Requirements Documents (CRD) referenced in this Order (Policy, etc.). With regard to BPA contractors, all

requirements and expectations for both BPA and its Contractors are incorporated into the Bonneville Purchasing Instructions (BPI) requiring contractors to comply with all BPA policies.

BPA's equivalency for sections 1a(2) and 4a(2) is BPA's capital planning process, including the IT system life cycle (SLC), that is directly related to BPA's electric utility requirements. These equivalencies follow the laws and regulations referenced in section 1a(2) of the order. BPA's equivalency for section 1a(4), 4a(4), and Attachment 1 is the Bonneville Purchasing Instructions (BPI). BPA uses the BPI for acquisition guidance, including for IT hardware and software acquisition decisions, as well as internal BPA Policy 473-1, Acquisition of IT Assets.

RECOMMENDATION: Recommend that you approve this equivalency document.

Elliot E. Mainzer, Administrator and Chief Executive Officer, Bonneville Power Administration

APPROVE:  DISAPPROVE: _____ DATE: 6/26/15

CONCURRENCES/ CONSULTATIONS: Michael Johnson, CIO

cc:

Skila Harris

Senior Advisor, Power Marketing Administration, Department of Energy