



REPUBLIC OF LIBERIA
PUBLIC PROCUREMENT & CONCESSIONS COMMISSION

EXECUTIVE MANSION GROUNDS, CAPITOL HILL, MONROVIA, LIBERIA
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Ref. **PPCC/RL/CEO/1393/25'**

December 16, 2025

Hon. Mohammed M. Sherif
ACTING MANAGING DIRECTOR
Liberia Electricity Corporation
Waterside
Republic of Liberia

Dear Hon. Sherif:

Subj: **REQUEST FOR NO OBJECTION TO SOLE SOURCE SENAPT AMI SMART ENERGY SOLUTIONS FOR ADVANCED METERING INFRASTRUCTURE (AMI) SUPPLY, INSTALLATION, COMMISSIONING, AND SUPPORT**

The Commission (PPCC) acknowledges receipt of the Liberia Electricity Corporation's request seeking the Commission's "No Objection" to sole source **Senapt** for the provision of **Advanced Metering Infrastructure (AMI) Smart Energy Solutions**, including supply, installation, commissioning, and ongoing support. The request is predicated on Sections **55(1)(a)** and **55(1)(d)** of the Public Procurement and Concessions Act (PPCA), 2010.

According to the submission, the estimated cost for **Phase One** of the project is **US\$18,000,000.00 (Eighteen Million United States Dollars)**, while the total projected cost of the national AMI program is **US\$50,000,000.00 (Fifty Million United States Dollars)**, comprising US\$18 million for Phase One and US\$32 million for subsequent phases. The proposed funding source is the **FY 2026 Draft National Budget**.

In keeping with its statutory mandate, the Commission conducted a thorough review of the request in line with the **PPCA, 2010, and its Amended Regulations**, to assess the legal sufficiency and technical credibility of the justification advanced by LEC. The review took into consideration the governing principles of public procurement, prevailing market conditions, and international procurement best practices.

Following the review, the Commission notes that LEC's justification is primarily based on claims of proprietary integration and the existence of a unique "end-to-end" AMI ecosystem under **Section 55(1)(a)**, as well as an asserted urgency to implement a national AMI modernization program under **Section 55(1)(d)**. However, the PPCA, 2010, particularly **Section 46**, establishes open competition as the general rule for public procurement in Liberia, while sole source procurement is an exceptional method permitted only where the strict conditions set out under **Section 55** are fully satisfied.

The Commission further observes that the estimated contract value of **US\$18 million for Phase One** and **US\$50 million for the overall program** clearly places this procurement within the threshold for **International Competitive Bidding (ICB)** as prescribed under **Section 49** of the PPCA, which is intended for high-value and technically complex procurements of this nature. In addition, from a technical and market perspective, Advanced Metering Infrastructure (AMI) solutions constitute a mature and highly competitive global market. Numerous reputable international vendors and system integrators are capable of delivering comprehensive AMI solutions, including smart meters, Head-End Systems (HES), Meter Data Management Systems (MDMS), communications infrastructure, and cybersecurity components. This confirms that the AMI requirement is not exclusive to a single supplier and can be competitively sourced.

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While LEC asserts that Senapt offers a uniquely integrated proprietary solution compatible with **STS Edition 2** and **DLMS/COSEM**, the Commission notes that both standards are open, internationally recognized interoperability frameworks specifically designed to promote multi-vendor compatibility. As such, compliance with these standards supports competition rather than exclusivity. The Commission also did not find sufficient evidence demonstrating that Senapt holds exclusive intellectual property rights or that no other vendor can legally or technically provide a secure and compatible AMI solution, as required under **Section 55(1)(a)** of the PPCA.


Regarding the urgency under **Section 55(1)(d)**, the Commission notes that LEC's own implementation timeline indicates that Phase One is planned for the first quarter of 2026, with subsequent phases extending through the fiscal year. This reflects a planned, multi-year strategic investment rather than an unforeseeable emergency. International and national procurement best practices interpret urgency narrowly, restricting its application to unforeseen circumstances where competitive procurement cannot reasonably be undertaken. Accordingly, the Commission finds that the urgency condition has not been met.

The Commission is also mindful of the significant risks associated with awarding a **US\$50 million national program** through sole source procurement, including vendor lock-in, reduced negotiating leverage, long-term operational dependency, and reputational and governance risks. These risks are further compounded by the fact that the proposed funding source is a **draft, non-approved national budget**, which is not yet legally appropriated.

In view of the foregoing, the Commission hereby informs LEC as follows:

- The PPCC **does not grant the requested "No Objection"** to sole source Senapt for the national AMI program, as the conditions under Sections **55(1)(a)** and **55(1)(d)** of the PPCA, 2010 have not been satisfied, and the contract value falls squarely within the threshold for International Competitive Bidding.
- LEC is hereby advised to undertake the procurement using an **open and competitive method**, preferably **International Competitive Bidding (ICB)**, in accordance with **Section 49** of the PPCA, 2010. The Commission notes that an ICB process can adequately accommodate all of LEC's technical and operational requirements through well-defined bidding documents, including:
 - ❖ Full compatibility with existing LEC systems, including STS Edition 2 and DLMS/COSEM standards;
 - ❖ Proven interoperability with existing STS-based vending platforms, CRM, and billing systems;
 - ❖ Robust cybersecurity and data protection measures aligned with international standards; and
 - ❖ Delivery of a comprehensive end-to-end AMI solution, including meters, systems, communications, installation, and ongoing support.

The Commission remains available to provide the necessary guidance and oversight to ensure that the procurement process is conducted in full compliance with the PPCA, 2010, while achieving transparency, competition, and value for money in the national interest.

Sincerely yours,

Roger Scott Johnson
CHIEF EXECUTIVE OFFICER
Procurement Commission