

1 R. MARSIL JOHNSON  
2 BLAIR STERLING JOHNSON & MARTINEZ  
3 A PROFESSIONAL CORPORATION  
4 238 ARCHBISHOP FLORES ST STE 1008  
5 HAGÁTÑA GU 96910-5205  
6 TELEPHONE: (671) 477-7857

**RECEIVED**  
OFFICE OF PUBLIC ACCOUNTABILITY  
PROCUREMENT APPEALS  
DATE: 09/24/14  
TIME: 4:35  AM  PM BY: JB  
FILE NO OPA-PA: 14-008

*Attorneys for Party in Interest Mobil Oil Guam Inc.*

7 **IN THE OFFICE OF PUBLIC ACCOUNTABILITY**  
8 **PROCUREMENT APPEAL**

9 **In the Matter of** ) **Docket OPA PA-14-008**  
10 **IP&E HOLDINGS, LLC.,** )  
11 **Appellant,** ) **INTERESTED PARTY**  
12 **And** ) **MOBIL OIL GUAM INC.'S**  
13 **GUAM POWER AUTHORITY,** ) **ISSUE LIST**  
14 **Purchasing Agency.** )  
15 \_\_\_\_\_ )

16 Interested party, Mobil Oil Guam, Inc. ("Mobil"), hereby submits its list of issues  
17 remaining to be determined at the hearing on the above-captioned procurement appeal.

18 1. Whether Guam Power Authority was permitted, pursuant to the terms of IFB  
19 GPA-029-14, to award the contract to multiple bidders depending on the lowest bid per plant  
20 location or whether GPA was required to award the contract in whole to the lowest aggregate  
21 bidder.  
22

23 **DATED** this 24<sup>th</sup> day of September, 2014.

24 **BLAIR STERLING JOHNSON & MARTINEZ**  
25 **A PROFESSIONAL CORPORATION**

26 BY: R. Marsil Johnson  
27 **R. MARSIL JOHNSON**  
28 *Attorneys for Party in Interest Mobil Oil Guam Inc.*

LAW OFFICES  
**BLAIR STERLING JOHNSON & MARTINEZ**  
A PROFESSIONAL CORPORATION  
238 ARCHBISHOP FLORES ST STE 1008  
HAGAÑA GU 96910-5205

**CERTIFICATE OF SERVICE**


I, R. Marsil Johnson, do hereby certify that on the 24<sup>th</sup> day of September 2014, I caused to be served a copy of **INTERESTED PARTY MOBIL OIL GUAM INC.'S ISSUE LIST** to be served upon the following, via hand delivery:

**Purchasing Agency:** Joaquin C. Flores  
General Manager  
Guam Power Authority  
1911 Rte 16  
Harmon, Guam

**Appellant:** Steven Carrara  
IP&E Holdings, LLC  
646 Chalan San Antonio  
Tamuning, Guam 96913-3644

**DATED** this 24<sup>th</sup> day of September, 2014.

**BLAIR STERLING JOHNSON & MARTINEZ**  
A PROFESSIONAL CORPORATION

BY:   
**R. MARSIL JOHNSON**  
*Attorneys for Party in Interest Mobil Oil Guam Inc.*

U68\50556-285  
G:\MOGI\PLD\838-ISSUE LIST OF INTERESTED PARTY RE IP&E  
HOLDINGS-GPA.DOCX