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 PROCUREMENT APPEALS

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Attorneys for KEPCO-LG CNS CONSORTIUM

**BEFORE THE PUBLIC AUDITOR
 PROCUREMENT APPEALS
 TERRITORY OF GUAM**

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

IN THE MATTER OF)	Docket OPA PA-17-008
)	
SHANGHAI ELECTRIC POWER JAPAN CO.,)	
LTD. AND TERRA ENERGY, INC.)	
)	ENTRY OF APPEARANCE AS INTERESTED
Appellant.)	PARTY OF KOREA ELECTRIC POWER
AND)	CORPORATION AND LG CNS CO. LTD.
)	CONSORTIUM AND REQUEST FOR
GUAM POWER AUTHORITY,)	SERVICE OF PLEADINGS AND FILINGS
)	
Purchasing Agency.)	
_____)	

Korea Electric Power Corporation and LG CNS Co. Ltd. Consortium ("KEPCO-LG CNS Consortium") enters its appearance as an Interested Party in the above entitled matter, and requests service of notices, filings and pleadings in the above matter.

As stated in the Notice of Procurement Appeal filed herein on August 21, 2017 by Shanghai Electric Power Japan Co., Ltd. and Terra Energy, Inc. ("SEPJ") KEPCO-LG CNS Consortium is a competing successful bidder in GPA IFB-070-16, Phase II. On July 10, 2017 GPA recommended an

award therein to KEPCO-LG CNS Consortium. SEPJ filed its protest with GPA on July 24, 2017. Upon denial of such protest by GPA on August 3, 2017, SEPJ filed the appeal herein on August 21, 2017.

KEPCO-LG CNS Consortium is an Interested Party pursuant to 2 GAR § 12102(b) which provides:

Interested Party means an actual or prospective bidder, offeror, or contractor who appears to have a substantial and reasonable prospect of receiving an award if the Appeal is denied.

KEPCO-LG CNS Consortium intends to be heard as an Interested Party herein and requests service of all notices, filings and pleadings in this matter.

The undersigned party does hereby confirm that to the best of its knowledge, no case or action concerning the subject of this Appeal has been commenced in court. All parties are required to and the undersigned party agrees to notify the Office of the Public Auditor within 24 hours if court action commences regarding this Appeal or the underlying procurement action.

Dated: September 7, 2017.

ARRIOLA, COWAN & ARRIOLA
Attorneys for Korea Electric Power
Corporation and LG CNS Co. Ltd. Consortium

By: 
MARK E. COWAN