

**DETERMINATION AND FINDINGS  
FOR  
SOLE SOURCE PROCUREMENT**

1. **Authorization<sup>1</sup>**

- D.C. Code § 34-801
- D.C. Code § 34-804
- 15 D.C.M.R. § 3700

2. **Minimum Need**

The Office of the People’s Counsel for the District of Columbia (“OPC” or “Office”) requests the services of GMP LLP (GMP), which has considerable empirical expertise experience in drafting employment manuals and separation agreements, and working with the District government personnel services.

3. **Estimated Fair and Reasonable Price**

The total contract not-to-exceed price is **\$45,000**.

4. **Facts That Justify a Sole Source Procurement**

A. The Office of the People’s Counsel for the District of Columbia is an independent agency of the District of Columbia government. By law, it advocates for consumers of natural gas, electric, and telephone services in the District. District of Columbia law designates the Office as a party to all utility-related proceedings before the Public Service Commission. The Office also represents the interests of District ratepayers before federal regulatory agencies. The Office is authorized to investigate the operation and valuation of utility companies independently of any pending proceedings.

- B. GMP LLP (GMP), a District of Columbia Certified Business Enterprise (CBE), is prepared to serve the Office of the People’s Counsel (OPC) as outside counsel, helping to navigate the challenges that arise as an independent agency of the District of Columbia government. GMP offers OPC a complete portfolio of employment, personnel, and policy skills. GMP proposes continuing to assist OPC as an outside counsel to provide legal advice regarding all aspects of the agency’s operations, especially regarding personnel and interactions with local and federal agencies. GMP further proposes to meet with the People’s Counsel, the Deputy People’s Counsel, and/or designated OPC staff to establish a list of, and a timeline for, deliverables under this contract too:
- Assist with updating the OPC’s employee manual.
  - Finishing problematic OPC personnel issues.
  - Completing other legal tasks to accomplish before the end of this fiscal year.
- C. It is for the reasons outlined herein that it is recommended that a sole-source contract be exclusively awarded to GM LLP (GMP).

5. **Certification by the Contracting Officer**

I hereby certify that the above facts are accurate and complete.

*Naunihal Singh Gumer*

06/09/2026

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Naunihal Singh Gumer

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Date

Agency Administrator

**DETERMINATION**

Based on the above findings and in accordance with the District of Columbia procurement regulations: *DC Law: 34-804; DC Law: 34-801; and 15 DCMR §3700*,

I hereby determine that the award of a sole source contract for the services described herein is in the best interest of the Office of the People’s Counsel.

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Michael Smalls

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Date

**Chief Operating Officer**

**1** Procurement authority is vested in the Commission pursuant to § 13(c) (2) of the Residential Real Property Seller Disclosure, Funeral Services Date Charge, and Public service Commission Independent Procurement Authority Act of 1998 (D.C. Law 12-263). The Commission is statutorily exempt from the D.C. procurement rules as set forth in D.C. Official Code § 1-1181 et seq.

D.C. Code § 34-804, hereby established within the Public Service Commission of the District of Columbia, as established by D.C. Code § 34-801, as Office to be known as the "Office of the People's Counsel." The Office shall be a party, as of right, in any investigation, valuation, revaluation, or proceeding of any nature by the Public Service Commission of or concerning a public utility operating in the District of Columbia.

15 D.C.M.R. § 3700: Public Utilities and Cable Television – Public Service Commission Rules of Practice and Procedure.