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DEI Power Inc.

UL 891 Switchgear Assemblies

1745 S Bon View Ave, Ontario, CA 91761, United States *(final assembly, integration, testing, and quality control)*

Buy America (BABA) Manufactured Product Self-Certification

DEI Power hereby certifies that the UL 891 switchgear assemblies supplied for this project comply with the Build America, Buy America (BABA) domestic content requirements applicable to manufactured products, as required under 2 CFR Part 184 and relevant agency guidance.

The switchgear assemblies are manufactured in the United States, where DEI Power performs final mechanical and electrical assembly, integration of all components, internal wiring and bus assembly, testing, inspection, and quality assurance, UL 891 compliance verification.This work results in a new, functionally distinct manufactured product.

Domestic content compliance is determined by calculating the cost of U.S.-origin components relative to the total cost of all components incorporated into the finished switchgear assembly.

Certain components, including circuit breakers supplied by Siemens Industry, Inc., are classified as non-domestic components, as documented by Siemens. These components are included in the total material cost calculation accordingly

Based on DEI Power's bill of materials and cost analysis, the finished switchgear assembly meets or exceeds the required domestic content threshold applicable to the project. Labor costs are excluded from the domestic content calculation, consistent with federal guidance.

I hereby certify that the information provided herein is accurate and complete to the best of my knowledge and that the manufactured product identified above complies with applicable Buy America / BABA requirements.

Authorized Representative:
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Title: Production Manager
Company: DEI Power Inc.
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Signature: 

Date: February 10, 2026

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February 3, 2025

Siemens Industry, Inc.
Smart Infrastructure – Electrical Products
Circuit Protection & Controls Business Unit
3617 Parkway Lane
Peachtree Corners, GA 30092, USA

Subject: U.S "Domestic Content" Requirements – Siemens WL, 3WA, and 3VA Breaker Results

Dear Valued Siemens Customer,

Following a comprehensive investigation and consultations with subject matter experts across various departments within Siemens Industry Inc., including the Grand Prairie breaker plant (Mayfield), Product Management, Quality, Siemens Apparatus Business Unit, and our U.S. Federal Center of Competency, we have determined that the Siemens WL, and 3WA Insulated Case Circuit Breakers (ICCB) UL 489, Power Circuit Breakers (PCB) UL 1066, and the 3VA Molded Case Circuit Breakers (MCCB) UL 489 thermomagnetic (3VA4x, 5x) and electronic trip units (3VA6x) — do not meet the criteria for "Domestic Content" as defined in the "Manufactured Product" or "Manufactured Product Component" outlined in the "Domestic Content Bonus Credit Guidance under Sections 45, 45Y, 48, and 48E." This would hold true for other "Buy America" requirements. We use the IRA example for solar throughout this letter.

Siemens Mayfield Breaker Plant:

The Grand Prairie Breaker Plant, commonly known as "Mayfield" in Grand Prairie, TX, serves as a late-point production facility for WL UL and ANSI rated Insulated Case Circuit Breakers (ICCB) and Power Circuit Breakers (PCB), in addition to the 3VA51 to 54 thermomagnetic trip and 3VA61 to 64 electronic trip Molded Case Circuit Breakers (MCCB). The foundational "frame" of these breakers is manufactured at our OEZ breaker plant in Letohrad, Czech Republic (CZ) and is transported to the Mayfield plant as a fully assembled breaker frame with a complete current path and means of interrupt. In accordance with the guidance provided in Section 3.01 (2)(3) of the Manufacturing Process, which defines "manufacturing process" as the application of processes adding value and transforming materials into a new item functionally distinct from mere assembly, our late-point manufacturing process at Mayfield does not fulfill this requirement. This is because the breaker "frame" retains its functional status as a breaker throughout Mayfield's production, assembly, and testing processes, concluding as a fully functional UL rated breaker.

Deep dive the WL UL 489 ICCB main breaker:

Throughout our investigation, our primary test sample was on the WL UL 489 Insulated Case Circuit Breaker (ICCB). Notably, this breaker is exclusively available through the production process employed at the Mayfield plant on a global scale. The fundamental frame of this breaker possesses a distinct part number and is crafted into a unique configuration. For instance, the basic frame for a 4000 A frame size 3, is an IEC frame identified by the MLFB 3WL23504AS321AA0. Through our late-point manufacturing process, this IEC Air Circuit Breaker (ACB) frame undergoes transformation, resulting in a fully tested and certified UL 489 breaker configured as L3F340ZYXXXXXXN. Although different in application and acceptance by UL and ANSI requirements, it is not "functionally distinct".

Historically "domestic content":

It is noteworthy to highlight that in previous U.S. guidance and within the framework of import/export laws, the Grand Prairie breaker plant and its late-point manufacturing process were deemed to constitute domestic content. However, a shift in regulations became apparent in recent years that changed this. Presently, with the evolution of

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import/export laws and the introduction of legislative initiatives such as the Inflation Reduction Act (IRA), and others commonly referred to as “Buy America,” our late-point manufacturing process no longer qualifies for recognition as "domestic content" when considered as components within the specified regulations.

Siemens Electrical Products (EP) Systems Business:

Given that Siemens WL, 3WA, and 3VA were not recognized as "domestic content," we initiated discussions with our sister business unit, Electrical Production Systems, also known as Apparatus. Our inquiry specifically addressed how they manage “domestic content” considerations for the panelboard UL 67, switchboard UL 891, and switchgear UL 1558 they produce using these circuit breakers. EP Systems bid, constructed, and market as turnkey solutions in the industry. The PLM manager takes charge of addressing inquiries related to "domestic content" for the Systems business. Our findings, supported by insights from the Siemens U.S. Federal Center of Competency, revealed the following:

In examining a switchboard configuration, they conduct a comprehensive breakdown of materials, encompassing steel, copper, hardware, plastic insulation barriers, surge suppression devices, meters, wiring, main breakers, branch breakers, and pilot devices costs. They identify components that are sourced or made in the U.S. versus those with non-U.S. origins, calculating the respective U.S. and non-U.S. content percentages in relation to the total cost. EP Systems consistently finds that their calculations yield a U.S. content percentage ranging between 50-65%, aligning with the content guidelines sought by end customers. Notably, the Siemens Apparatus business exclusively employs WL, 3VA, meters, surge suppression devices (SPDs), and pilot devices, none of which are domestically qualified components. Despite this, the likelihood is high that the calculated U.S. content percentage would meet the current IRA requirement of 40%, and the projected 55% by 2025. It is imperative to mention that that labor costs cannot be factored into this calculation; only physical material costs are considered, as explicitly outlined in the IRA documents. Note, other “Buy America” requirements may have a higher percentage of domestic content.

Project Scope:

Our Siemens U.S Federal Center of Competency team has emphasized that end-users involved in these projects must adopt a comprehensive approach when evaluating domestic content eligibility. This evaluation encompasses all components associated with the project: using a utility scale solar project as an example: includes solar panels, joiner boxes, string inverters, switchboards, step-up transformers, and any other relevant elements. The overarching objective is to ensure that the cumulative domestic content across the entirety of the project meets the required thresholds to be considered eligible. This underscores the importance of a comprehensive assessment of the project's components to ascertain eligibility.

Conclusion:

We took the opportunity to outline how our Apparatus group navigates similar challenges and drew parallels between their practices and those of our AMPLIFY panelbuilders and OEMs in offering Switchboard or other solutions to the market. While we are not privy to your specific calculation results, we anticipate that you may encounter similar outcomes aligning with the requirements. We value your business, and our team remains ready to provide assistance wherever possible. Feel free to reach out if you have any questions or require further support. Thank you for your continued partnership!

Sincerely,

Michael R. Day
Manager of Power OEM Business Development
Smart Infrastructure – Electrical Products - Circuit Protection & Controls Business Unit