

Good morning. My name is Chien Chi Chao; I am an Economic Officer with the Taipei Economic and Cultural Representative Office in the United States (TECRO), representing the Government of Taiwan, with the support of the Taiwan Photovoltaic Industry Association (TPVIA). Taiwan, in support of the brief submitted by the Solar Energy Industries Association (SEIA), will highlight two issues from our prehearing injury brief, and respectfully refer the Commission to that brief for elaboration of these points.

First, cell imports have no adverse effect on the domestic industry. The nature of the domestic industry evidences that such imports are necessary: as Petitioners and the Commission recognize, most cells produced in the United States are internally consumed, leaving very few domestically-produced cells available for commercial sale. Meanwhile, domestic demand for cells has outgrown domestic supply of the same. Thus, even without imports, domestic cell producers would not be able to meet the growing domestic demand for cells. U.S. module producers who do not manufacture their own cells need imports in order to be competitive.

In particular, they need high efficiency cells. The utility segment has driven U.S. demand for solar cells and modules, yet domestic producers have failed to meet this demand. And irrespective of market segments, U.S. producers and purchasers have indicated that, as with cells more generally, there is an insufficient supply of domestically-produced high efficiency cells – to the degree that such supply exists at all. Imports of high efficiency cells cannot be adversely affecting the same producers that need them.

Second, Taiwan has provided the U.S. market with its needed supply of CSPV products, especially high efficiency cells. Although the industry produces both cells and modules, most of Taiwan's solar exports to the United States are of cells. As stated in our brief, direct shipments of modules from Taiwan are negligible, and Taiwanese producers focus on cells because this is

what the U.S. downstream module markets relies on for the production of their modules or panels. Indeed, in case the ITC rules that the U.S. industry has suffered serious injury, this cannot be attributed to Taiwanese imports. To the contrary, Taiwanese producers, especially cell manufacturers, help the U.S. producers to remain competitive by supplying the high efficiency cells that they need. Moreover, as the data shows, after the imposition of the anti-dumping order in 2015, Taiwanese cell imports to the U.S. have substantially declined.

Thank you for your time.