

**BEFORE THE UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**CRYSTALLINE SILICON PHOTOVOLTAIC CELLS AND MODULES FROM CHINA
INV. NOS. 701-TA-481 AND 731-TA-1190 (REVIEW)**

**TESTIMONY OF
VIRINDER SINGH
DIRECTOR OF REGULATORY AND LEGISLATIVE AFFAIRS AND
HEAD OF U.S. GOVERNMENT AFFAIRS, EDF RENEWABLES**

Good afternoon, Chairman Johanson, Commissioners, and Staff. My name is Virinder Singh, and I am Director of Regulatory and Legislative Affairs and head of U.S. Government Affairs at EDF Renewables (“EDFR”). EDFR is a renewable energy development and operations company headquartered in San Diego, California.

EDFR employs 885 full-time employees in the United States. We are one of the largest utility-scale renewable energy developers in the U.S. We installed 209 MW of solar photovoltaic generation projects in 2017 and plan to install another 147 MW this year. These projects are located across the country and employ approximately 2,447 construction workers.

We have been able to pursue a vigorous development strategy in the U.S. market without sourcing solar modules from China. In fact, we have not sourced solar products from China since 2012, instead procuring CSPV modules from Malaysia, Singapore, Thailand, and Vietnam, as well as thin-film modules from the

United States. We have no plans to source modules from China for our current projects in construction.

I want to emphasize to the Commission that, in making our module sourcing decisions, cost is not our primary focus. As both a developer and an operator of solar photovoltaic generation projects, EDFR focuses on quality. We evaluate whether a potential supplier has sufficient availability of supply, has sufficient warranty provisions, is bankable with sufficient credit, and can meet our rigorous technical specifications. Over the past few years and for the foreseeable future, we are able to source modules based on these specifications outside of China. Unfortunately, U.S.-based manufacturers of crystalline modules have not been able to meet our demanding standards for volume, warranty, bankability, and quality. Suniva does not currently manufacture solar cells or modules. And, even when it was producing them, they were not able to meet our quality and performance requirements. SolarWorld has curtailed its operations and is also unable to meet our requirements. We do not expect Sunpower's acquisition of SolarWorld's Oregon facility to change this status quo.

At present, we do not expect U.S. manufacturers to be able to reach sufficient volume, quality, or product innovation to meet our needs in the U.S. utility-scale market. Nevertheless, we will continue to actively monitor the U.S. manufacturing landscape, and we are open to purchasing U.S.-assembled

crystalline modules in the future. I am pleased to report that EDFR is currently sourcing U.S.-made thin film modules from Ohio.

Turning to the future, our plans for installation in 2019 and 2020 should exceed what we installed in 2017 and 2018—this is due to a strong U.S. market for solar photovoltaic power generation and the fact that solar energy has become cost competitive with other forms of energy in certain key state markets. In particular, the U.S. Department of Treasury’s revised guidance on the federal investment tax credit will likely further fuel demand. The guidance requires initial generation from solar projects before 2024 in order to obtain the more significant benefits prescribed in the investment tax credit. This revised incentive policy is forecast to induce a spike in demand for solar generation from offtakers who want to capture the value of the investment tax credit. This means that the U.S. market presents strong opportunity for U.S. manufacturers of solar modules well into next decade.

Thank you for your attention. I would be pleased to answer any questions.