



May 2, 2024

The Honorable Gina M. Raimondo
Secretary of Commerce
U.S. Department of Commerce
14th Street & Constitution Avenue, NW
Washington, D.C. 20230

Dear Secretary Raimondo:

The Advanced Power Alliance (APA) represents developers of utility-scale wind, solar, and energy storage projects throughout the renewable energy resource-rich regions of our country. Additionally, we represent the communities, consumers, corporate offtakers, and investors benefiting from those developments. We write to share our concerns about a request for antidumping and countervailing measures covering crystalline silicon photovoltaic cells and modules from Cambodia, Malaysia, Thailand, and Vietnam.

The United States' solar manufacturing capacity is significantly expanding thanks to visionary pro-manufacturing provisions in the Inflation Reduction Act (IRA). Since the passage of IRA, more than 250 gigawatts of production capacity have been announced across the solar supply chain, representing more than 27,000 potential jobs and more than \$14 billion in new investment. At the same time, US solar manufacturers are achieving strong financial results, and many have sold out through 2026. While proponents of these duties portray them as necessary to protect American manufacturers, the reality is that American solar manufacturing is demonstrably on the rise. Rather than hurt the future prospects of solar in our country, the unnecessary imposition of new duties would hurt the solar economy by harming relied-upon supply chains and disrupting project development pipelines for the solar development and construction companies leading the energy transition by building solar projects and putting "steel in the ground" today.

As we build out our domestic manufacturing capacity with a stable and predictable regulatory framework, it is important to note that some US panel makers still rely on imported cells and other basic components to manufacture solar panels. The imposition of proposed duties would undoubtedly compel these suppliers to increase their prices, increasing the cost of their product for the very developers our country is trying to encourage. Notably, the United States already has the world's most expensive solar panel market, with panels that are two to three times more expensive than elsewhere globally.

This petition, if granted, could threaten existing and future solar projects that rely on panels with imported cells and modules, as well as the 270,000 well-paid solar jobs that these projects support today. These new duties will stymie the broadly beneficial energy transition while inflicting extraordinarily detrimental impacts on American power consumers, rural economic development, and the environment.

Solar development plays a critical role in states seeking economic diversification, in achieving our clean air and other environmental objectives, and in providing consumers with affordable power. America cannot achieve its energy security, economic prosperity, and climate goals without a thriving and expanding solar

industry playing a key role in our energy portfolio. After years of uncertainty on these issues, the duties being proposed will again create unneeded ambiguity and disruption which will undermine the business of our members and force project cancellations and delays. This, consequently, places long term power supply agreements for other industries in jeopardy.

Stable trade policy is a fundamental foundation that members of our organization rely on, and we fear that this petition would impede their ability to supply essential clean energy to American homes and businesses. At a time when energy production must be significantly scaled up to meet the needs of American consumers and our allies around the world, the imposition of new duties adding costs on clean power developers will create a negative “ripple effect” in our economy. This action seems to be an ill-advised, unforced error that undermines our shared goals.

We urge you to dismiss this request and decline to pursue this harmful action that will place needless obstacles in the path of the many clean energy developers working to meet America’s clean energy and economic goals.

Thank you for your consideration. Please call on me any time we may be of help to you.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jeffrey Clark". The signature is fluid and cursive, with a large initial "J" and "C".

Jeffrey Clark
President and CEO

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