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April 8, 2022

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
SHERCO SOLAR PROJECT
DOCKET NO. E002/M-20-891

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this letter regarding our proposed Sherco Solar project.

We are excited about the Sherco Solar project as the largest single solar development ever proposed in the state, the lowest-cost solar on our NSPM system, and as a replacement for the first coal unit retiring at the Sherco plant. However, we are writing to update the Commission on a significant recent industry event that is compounding existing global supply chain shortages from the pandemic and an inflationary environment that is creating financial pressure on all kinds of development projects.

Less than two weeks ago, on March 28, 2022, the U.S. Department of Commerce announced that it will move forward with an anti-dumping circumvention investigation of solar cells from four Southeast Asian countries in response to a petition filed by a California-based solar panel assembler. The case centers around whether Chinese manufacturers are assembling products in Cambodia, Malaysia, Thailand and Vietnam using parts and components made in China in order to sidestep tariffs. While the impact of this investigation is still unknown, it is clear the consequences are far ranging and could be crippling for the solar industry for the next several years.

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Indeed, an affirmative circumvention determination could result in retroactive application of tariffs on all panels imported from the subject countries from November of 2021 forward, and those tariffs could range from approximately 10% to over 500% of the panel costs. For context, the countries subject to the investigation accounted for more than 85 percent of U.S. solar panel imports in the fourth quarter of 2021, and the Sherco Solar project requires approximately 1 million panels, comprising about one-third of the total project price. In Attachment A, we provide more context on recent industry events, including the circumvention investigation, and discuss numerous projects that are currently being cancelled, paused, or re-priced -- including several of those on the Xcel Energy system. We also include as Attachment B articles regarding industry reaction and impacts of the Commerce investigation.

To be clear, this new development does not impact our need for the project -- to both preserve the Sherco 2 interconnection rights and to meet the capacity need identified in the recent Integrated Resource Plan -- but rather underscores even more greatly how important and urgent this project is. Nevertheless, given the significant challenges and uncertainty posed by the circumvention investigation (on top of existing supply chain shortages), we need time to assess the industry impacts of this investigation, to discuss alternatives with our potential suppliers, and to reevaluate our pricing for this project.

We are currently evaluating options and industry guidance as to timeframes for when there may be answers or more certainty, and we are working with organizations like The American Clean Power Association to mitigate the impacts of the U.S. Department of Commerce inquiry on our clean energy future. Currently, we expect a preliminary decision from the U.S. Department of Commerce on the solar tariff investigation in September -- but there will likely be more information ahead of that. In the meantime, we request that the Commission temporarily suspend this proceeding and not schedule this issue for hearing, and we will provide the Commission with updates as we have them -- but certainly within 60-90 days. Given this substantial disruption, we are also assessing the timing of our upcoming Request for Proposals (RFP) to procure the remaining near-term renewables approved in our IRP. We will likewise update the Commission as we make decisions regarding the timing of that RFP.

Lastly, we want to thank our labor partners -- LIUNA, the 49ers, and the carpenters -- for their continued and strong support of the Sherco Solar project. We are also pleased to announce that we reached agreement with the City of Becker (as further discussed in the companion Siting and Route dockets 21-189, 21-190 and 21-191) and now have their support for the project as well.

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Attachment A is marked “Not-Public” as it contains information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information derives independent economic value from not being generally known or readily ascertainable by others who could obtain a financial advantage from its use. Thus, Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Attachments

c: Service List

Northern States Power Company

Docket No. E002/M-20-891
Reply Comments – Sherco Solar Project
Attachment A – Page 1 of 4
April 8, 2022

Solar Market Conditions

Current solar market dynamics – including global supply chain shortages, rising commodity prices, transmission constraints, interconnection process delays, an overall inflationary environment, and now a major, recently-announced U.S. Department of Commerce antidumping investigation – are contributing to rapid and significant project cost increases, delays, and cancellations across the industry.

Year-over-year prices have risen across all solar market segments for three consecutive quarters, leaving utility-scale solar prices 18 percent higher than a year ago when the Company first proposed the Sherco Solar project.¹ In the most recently available data from the U.S. Energy Information Administration’s EIA-860 report, there were more than 1,000 MW of cancelled solar projects reported in 2020, with 2021 data yet to be released.² In the Company’s Colorado service territory alone, we received six different solar bids since 2017 that failed due to an inability to maintain bid price during PPA negotiations. As a recent industry article states:

The project delays and cancellations are not only due to delays in getting products that go into developing a solar project, they’re also because prices have been going up very quickly at the same time, thanks to those supply chain constraints and inflationary pressures.” Shawn Rumery, SEIA’s senior director of research.³

On top of these existing market pressures, the U.S. Department of Commerce (DOC) announced on March 28, 2022 that it will initiate an investigation into companies circumventing antidumping (AD) and countervailing duty (CVD) by importing solar cells from four Southeast Asian nations that accounted for 85 percent of all solar

¹ CNBC, “Solar costs jumped in 2021, reversing years of falling prices,” March 10, 2022, <https://www.cnbc.com/2022/03/10/solar-costs-jumped-in-2021-reversing-years-of-falling-prices.html>.

² U.S. Energy Information Administration (EIA), EIA-860 Report, September 9, 2021, <https://www.eia.gov/electricity/data/eia860/>.

³ Utility Dive, “Supply-chain squeeze: Solar, storage industries grapple with delays, price spikes as demand continues to grow,” March 31, 2022, <https://www.utilitydive.com/news/solar-storage-delays-price-supply-chain/620537/>.

PUBLIC DOCUMENT–NOT-PUBLIC AND PROTECTED DATA EXCISED

Northern States Power Company

Docket No. E002/M-20-891
Reply Comments – Sherco Solar Project
Attachment A – Page 2 of 4
April 8, 2022

panel imports in Q4 2021⁴ – Vietnam, Malaysia, Thailand, and Cambodia – in response to a petition filed by a California-based solar panel assembler, Auxin Solar.⁵

While the overall impact of the DOC's investigation remains to be seen, initial signs are that it could be paralyzing for the solar industry over the next several years. Some industry experts estimate that there will be a 16 GW shortfall in solar panels over the next five years⁶ and that tariffs could be applied as far back as November 4, 2021,⁷ which would retroactively increase module prices and further delay projects. A new SEIA survey of more than 200 solar companies sheds light on the impacts of the DOC's investigation:

- 90% of U.S. solar companies said they expect the investigation to result in a “devastating” or “severe” negative impact on their domestic business in 2022;
- 75% of respondents stated that the investigation has already led to solar panel delivery delays or cancellations; and,
- Most respondents stated that at least 80% of their current year projects are now at risk because of the investigation.⁸

A preliminary determination by the DOC is not expected until September. As Abigail Ross Hopper, president and CEO of the Solar Energy Industries Association recently stated: “This misstep will have a devastating impact on the U.S. solar market at a time when solar prices are climbing, and project delays and cancellations are adding up.”⁹ She later added that the investigation is now causing an “existential crisis” for the U.S.

⁴ S&P Capital IQ, “US solar industry reels after ‘disastrous decision’ to open tariff probe,” April 5, 2022.

⁵ Utility Dive, “Commerce Department kicks off 1-year solar tariff investigation on panels imported from Southeast Asia,” March 29, 2022, <https://www.utilitydive.com/news/commerce-department-kicks-off-1-year-solar-tariff-investigation-on-panels-i/621153/>.

⁶ Wood Mackenzie Power & Renewables, “US solar supply-demand balance at stake: Anticipating the decision on Auxin Solar AD/CVD petition,” page 3, March 2022.

⁷ Utility Dive, March 29, 2022.

⁸ S&P Global, “US solar industry in 'existential crisis' from Commerce solar tariff investigation,” April 5, 2022, <https://www.spglobal.com/commodity-insights/en/market-insights/latest-news/electric-power/040522-us-solar-industry-in-existential-crisis-from-commerce-solar-tariff-investigation>.

⁹ Utility Dive, “Commerce Department kicks off 1-year solar tariff investigation on panels imported from Southeast Asia,” March 29, 2022, <https://www.utilitydive.com/news/commerce-department-kicks-off-1-year-solar-tariff-investigation-on-panels>.

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Northern States Power Company

Docket No. E002/M-20-891
Reply Comments – Sherco Solar Project
Attachment A – Page 3 of 4
April 8, 2022

solar industry.¹⁰ Edison Electric Institute (EEI) president Tom Kuhn echoed that assessment in a statement:

The initiation of these inquiries will have a harmful and disruptive impact on the solar supply chain, resulting in increased costs, project delays, and job losses. Ultimately, this will impede the nation's clean energy transition and increase costs for electricity customers.¹¹

In Iowa, Interstate Power and Light Company (IPL), a subsidiary of Alliant Energy, made a filing on April 5, 2022 in an advanced ratemaking proceeding for 400 MW of solar and 75 MW of battery storage. In the filing, IPL requested to delay an upcoming hearing by approximately 80 days to update the record with the impacts of recent global supply chain constraints and inflation.¹²

The Company has experienced similar issues with **[TRADE SECRET INFORMATION BEGINS...**

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Finally, the project developer of **[TRADE SECRET INFORMATION BEGINS...**

¹⁰ S&P Global Commodity Insights, "Platts Megawatt Daily," Volume 27, Issue 65, page 5, April 5, 2022.

¹¹ Edison Electric Institute (EEI), "EEI Statement on the U.S. Department of Commerce Decision on the Solar Circumvention Petition," March 28, 2022, <https://www.eei.org/resourcesandmedia/newsroom/Pages/pressreleases.aspx>.

¹² Iowa Power and Light Company, Motion to Extend Procedural Schedule (Docket RPU-2021-0003), April 5, 2022.

Northern States Power Company

Docket No. E002/M-20-891
Reply Comments – Sherco Solar Project
Attachment A – Page 4 of 4
April 8, 2022

...TRADE SECRET INFORMATION ENDS].

Solar projects in the Midwest were already experiencing market challenges before the DOC's antidumping investigation. In Wisconsin, Wisconsin Power and Light (WPL), another subsidiary of Alliant Energy, is working to develop a second tranche of 414 MW of solar projects across six different sites and recently adjusted its capital cost assumptions to reflect the market challenges facing its solar projects. As WPL stated in a post-hearing brief on February 11, 2022:

Third, and perhaps most importantly, WPL updated its capital cost assumptions for constructing new solar generation to reflect macroeconomic trends that have placed upward cost pressure on solar resources following the global pandemic. Prices for commodities like steel, silver, polysilicon, and copper (the raw materials used in solar panels and other components) have increased to two- or three-times pre-pandemic levels. Freight and transportation costs have also skyrocketed, and there are significant bottlenecks at American ports. These issues directly impact the cost and schedule for constructing solar projects in America, since many materials (especially panels) are imported. American trade policy has also significantly impact on the cost of solar equipment: an anti-dumping petition before the U.S. Department of Commerce created significant supply and price disruptions in the market for solar cells and panels, and the Biden Administration recently decided to extend existing tariff rates on imported solar cells, subject to certain caveats.

WPL observed firsthand the impact that these broader market and supply chain disruptions, which are beyond its control, have had on developing the Solar Projects. At the time WPL filed its updated application in this proceeding in September 2021, it worked to lock in pricing for key project components, including panels, racking, and inverters. As a result of these developments, the Blueprint analysis in this proceeding reflects a \$685 million (\$1,655/kWAC) cost estimate for the Solar Projects.¹³

¹³ Wisconsin Power and Light Company, Post-Hearing Brief (Docket No. 6680-CE-183), February 11, 2022, page 13.

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EEI STATEMENT ON THE U.S. DEPARTMENT OF COMMERCE DECISION ON THE SOLAR CIRCUMVENTION PETITION

WASHINGTON (March 28, 2022) – Edison Electric Institute (EEI) President Tom Kuhn issued the following statement today on the U.S. Department of Commerce's decision to initiate an investigation for circumvention tariffs on imported solar products from Cambodia, Malaysia, Thailand, and Vietnam.

"The initiation of these inquiries will have a harmful and disruptive impact on the solar supply chain, resulting in increased costs, project delays, and job losses. Ultimately, this will impede the nation's clean energy transition and increase costs for electricity customers.

"EEI's member electric companies are leading the clean energy transition, and we are working to get the energy we provide as clean as we can as fast as we can, without jeopardizing the reliability and affordability that are essential to the customers and communities we serve. Affordable solar energy is essential to achieving our carbon-reduction goals. We will be requesting that the Department of Commerce conduct an expedited review so the investigation does not drag on for months, and to avoid further harm and the delay of our nation's clean energy transition that is essential to customers. Our industry is supportive of the development of domestic production of clean energy technologies, and we look forward to working with the Biden Administration to ensure balance between clean energy progress and trade concerns."

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www.eei.org

EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for more than 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 65 international electric companies, with operations in more than 90 countries, as International Members, and hundreds of industry suppliers and related organizations as Associate Members.

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Commerce inquiry imperils solar industry, advocates say

By MATTHEW DALY March 28, 2022 GMT



WASHINGTON (AP) — In a decision that could dramatically undercut President Joe Biden’s ambitious climate goals, the Commerce Department said Monday it is investigating whether imports of solar panels from Southeast Asia are circumventing anti-dumping rules that limit imports from China.

Clean energy leaders said the investigation — which could result in retroactive tariffs of up to 240% — would severely hinder the U.S. solar industry, leading to thousands of layoffs and imperiling up to 80% of planned solar projects in the U.S. Such an outcome would jeopardize one of Biden’s top clean energy goals and run counter to his administration’s push for renewable energy such as wind and solar power.

The Commerce Department decision “signals that the Biden administration’s talk of supporting solar energy is empty rhetoric,” said Heather Zichal, CEO of the American Clean Power Association, a clean-energy group.

Zichal, who was White House energy adviser under President Barack Obama, called on Biden to reverse the decision immediately. “America’s solar workers and the clean energy community are watching and will remember,” she said, calling implications of the investigation “apocalyptic” for the industry.

“Overnight, the Commerce Department ... drove a stake through the heart of planned solar projects and choked off up to 80% of the solar panel supply to the U.S.,” she said, adding that Biden “must fix this now.”

The Commerce investigation follows a complaint by Auxin Solar, a small California-based manufacturer that said solar panels assembled in four Southeast Asian nations — Cambodia, Malaysia, Thailand and Vietnam — are circumventing rules intended to block imports of solar cells and panels from China.

The White House declined to comment, but a Commerce spokesman said the agency will “conduct an open and transparent investigation to determine whether circumvention” of U.S. trade law is occurring. “This inquiry is just a first step ... and no additional duties will be imposed at this time,” said spokesman Jeremy Edwards.

Auxin Solar CEO Mamun Rashid said he was grateful that Commerce officials recognized the need to investigate what he called “pervasive backdoor dumping” of solar panels by China. Solar manufacturers in smaller Asian countries use parts produced by Chinese companies as a way to keep costs down while skirting steep antidumping and countervailing tariffs on Chinese goods, he said.

“For years, Chinese solar producers have refused to fairly price their products in the U.S. and have gone to significant lengths to continue undercutting American manufacturers and workers by establishing ... operations in countries not covered by those duties,” Rashid said. “Fair trade and enforcement of our trade laws are essential to rebuilding the American solar supply chain and making solar (panels) in America again.”

The Commerce Department action comes weeks after Biden extended tariffs imposed by former President Donald Trump on most solar panels imported from China and other countries. In a nod to his efforts to combat climate change and boost clean energy, Biden excluded tariffs on some panels used in large-scale utility projects.

Biden’s Feb. 4 announcement continued many Trump-era tariffs, but he exempted so-called bifacial solar panels that can generate electricity on both sides and are now used in many large solar projects. The technology was still emerging when the tariffs were first imposed by Trump.

Biden also doubled an import quota on solar cells — the main components of panels that go on rooftops and utility sites — to 5 gigawatts, allowing a greater number of imported cells used by domestic manufacturers.

Biden faced a choice among competing constituencies on solar power, a key part of his climate and clean-energy agenda. Labor unions support import restrictions to protect domestic jobs, while the solar industry relies in large part on cheap panels imported from Asia.

In a speech this month, Commerce Secretary Gina Raimondo said the U.S. must boost domestic manufacturing of products such as solar panels.

“The more we rely on other countries to make things for us, the more vulnerable we become to supply chain disruptions like we have seen over the past two years,” she said March 15, adding that “at least 95% of the market for the cells that go into solar panels is estimated to have components that were produced in China.”

Biden has set a goal to cut planet-warming greenhouse gas emissions by at least 50% below 2005 levels by 2030, and solar power is a key part of that agenda. A report last year by the Energy Department says solar has the potential to supply up to 40% of the nation’s electricity within 15 years

— a tenfold increase over current solar output.

Abigail Ross Hopper, president and CEO of the Solar Energy Industries Association, which represents solar installers, called the Commerce investigation a “misstep” that could have a devastating impact on the U.S. solar market and result in tens of thousands of layoffs. The decision could result in retroactive tariffs of up to 240%, a possibility Hopper said would have an immediate and “chilling effect on the solar industry.”

Additional tariffs could cause the loss of 70,000 American jobs, including 11,000 manufacturing jobs, she said, and could result in a dramatic drop in solar installations and a corresponding increase in planet-warming greenhouse gas emissions from fossil fuels such as coal and natural gas.

“Solar prices are increasing, federal climate legislation is stalled and trade restrictions are now compounding,” Hopper said. “Commerce should quickly end this investigation to mitigate the harm it will cause for American workers and our nation’s efforts to tackle climate change.”

Trump approved tariffs on imported solar-energy components in 2018, saying his administration would always defend American workers and businesses from unfair competition. The tariffs were initially set at 30% and later cut to 18% and then 15%. They were set to expire without action by Biden.

Under Biden’s decision, tariffs will be set at 14.75% and gradually reduced to 14%.

Since the tariffs were imposed, solar-panel production in the U.S. has tripled. Chinese and South Korean companies have set up factories in Georgia, Florida and Alabama, and an American firm, First Solar Inc., expanded domestic production at a plant in Ohio.



DIVE BRIEF

SEIA reports 'rapid degeneration' of solar sector following federal anti-dumping investigation

Published April 6, 2022 • Updated 16 minutes ago



Iulia Gheorghiu
Editor

UPDATE: April 8, 2022: The Solar Energy Industries Association published survey results on Thursday from over 400 respondents showing that 78% of their expected module supply has been delayed or canceled since the Commerce Department initiated an anti-dumping investigation of solar exports from Cambodia, Malaysia, Thailand and Vietnam.

Dive Brief:

- The Solar Energy Industries Association is calling on the Department of Commerce to immediately issue a negative preliminary decision in the anti-dumping and countervailing investigation of solar photovoltaic imports from Cambodia, Malaysia, Thailand and Vietnam.
- The investigation, prompted by a February petition from California-based manufacturer Auxin Solar, could take up to a year for a final ruling, causing developers to scramble for changes in their panel supply as shipments are delayed or canceled due to uncertainty over the investigation, which could result in retroactive import duties.

- "It happened eight days ago and we're already seeing impacts from this decision to initiate an investigation," SEIA President and CEO Abigail Ross Hopper said during an online event on Tuesday. "We're already seeing a rapid degeneration of the U.S. solar industry as panel suppliers stop shipping to the United States."

Dive Insight:

U.S. solar developers are looking around the world for alternatives to the four countries subject to the Department of Commerce investigation to source their pipelines of solar projects, with large developers leaning on their resources and relationships to navigate the issues.

"While some of NextEra Energy's solar and storage projects may be adversely impacted by the disruption this decision is expected to cause, we will work closely with our suppliers and customers to assess the potential impacts of this investigation and remain confident in our ability to arrive at acceptable mitigation measures," NextEra said in a statement on Tuesday.

The Auxin petition charges that components and panels manufactured in China are bypassing tariffs through Southeast Asian countries, and Akin Gump Strauss Hauer & Feld partner Matt Nicely, representing SEIA, foresees difficulties in tracking and establishing that other countries and suppliers aren't similarly utilizing such parts to also bypass the tariffs that have been imposed on Chinese solar manufacturers.

"I don't think any particular developer is untouched," Dan Siegel, CEO of the utility-scale solar company Birch Creek Development, told Utility Dive. "We are fortunate in the sense that we don't have anything on a boat right now," he added, but this will impact timelines for 2023 construction plans.

SEIA and others in the solar sector have been vocal in opposing the investigation, alleging that it would not provide the incentives needed to develop solar manufacturing in the U.S., where there is not adequate supply for the growing solar demand.

"It's not a policy that creates an incentive to manufacture in the U.S. It creates an incentive to manufacture at lowest cost anywhere else," Siegel, a former renewable energy business development executive at U.S. Bank, said of the Commerce Department's investigation.

The U.S. solar industry has faced uncertainty in recent years with Section 201 tariffs imposed initially by the Trump administration for PV panels and crystalline-silicon modules manufactured in China. SEIA had advocated for the tariffs to get greatly reduced, if not revoked. The Biden administration extended the tariffs for four years in February, with an exception for the more efficient bifacial panels. While solar advocates were disappointed with the tariff extension, some analysts said these tariffs have not impacted the record-setting years of growth in the solar sector in recent years.

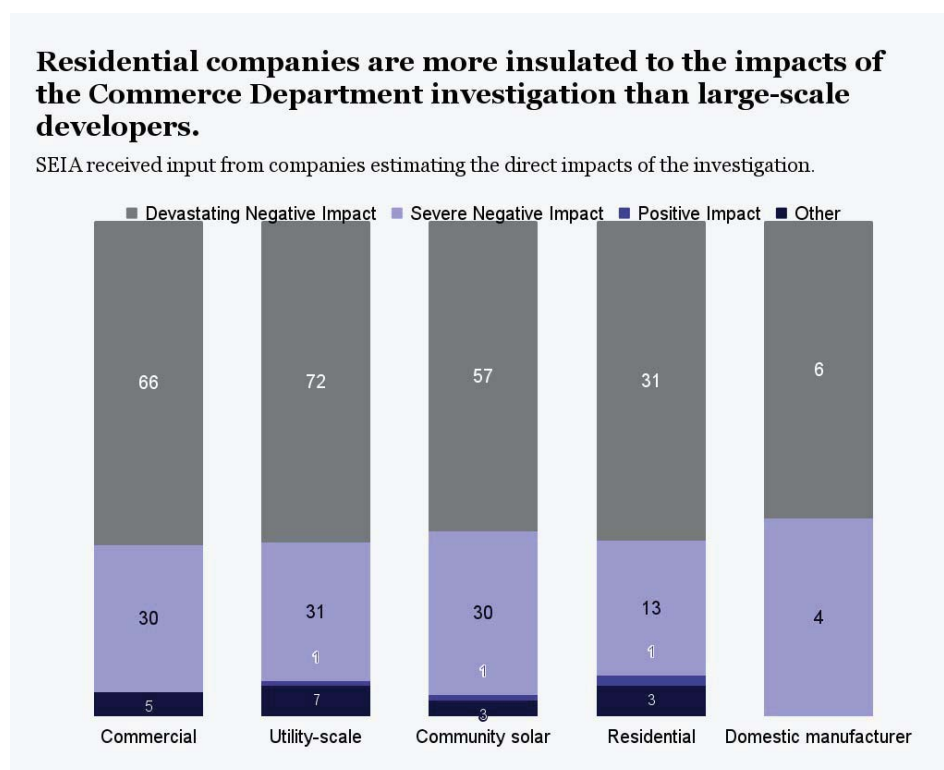
"We have not noted any impacts of tariffs on investments in the past five years," Raj Prabhu, CEO of clean energy research firm Mercom Capital Group, said in an email.

This changed with the Commerce Department's investigation of exports from Cambodia, Malaysia, Thailand and Vietnam, as shipments soon began to be withheld by suppliers. The anti-dumping and countervailing investigation made an immediate impact on imports and duties can also be applied retroactively if Commerce issues a positive determination.

SEIA said 74% of more than 200 respondents from a survey on the impact of the Commerce investigation said PV module shipments have been delayed or canceled.

SEIA received over 200 responses in two days after launching the survey. The early snapshot includes many market segments, and more than 90% of the companies polled reported on negative impacts to their bottom line.

Only 10 residential developers had answered the survey at the time of Utility Dive's inquiry, but that might be because the "residential space is one-layer insulated," and many buy through U.S. distributors instead of importing solar panels, Justin Baca, SEIA VP of markets and research, said during the webinar.



Iulia Gheorghiu/Utility Dive, data courtesy of SEIA

"The threat of these duties being imposed retroactively ... is the reason for many companies deciding to stop shipping," Matt Nicely, partner at Akin Gump Strauss Hauer & Feld, the firm representing SEIA, said during the webinar on Tuesday.

"The uncertainty around the case is already a cause for negative sentiment in the market. A positive ruling could cause investments

to slump and demand to decline," Prabhu said.

"Commerce has changed its mind between a preliminary and a final decision in the past," Julia Eppard, Akin Gump counsel, said on the webinar. According to her, there are no examples of the agency making a negative preliminary determination and a positive one in the final.

SEIA plans to update its industry impact survey on Thursday.

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S&P Capital IQ PRO

US solar industry reels after 'disastrous decision' to open tariff probe

Tuesday, April 5, 2022 5:40 PM ET

By Garrett Hering
Market Intelligence

American solar companies are experiencing widespread delays or cancellations of panel shipments since the U.S. Commerce Department opened its investigation in late March into whether solar manufacturers moved production to Southeast Asia to skirt tariffs on imports from China, according to a survey released April 5.

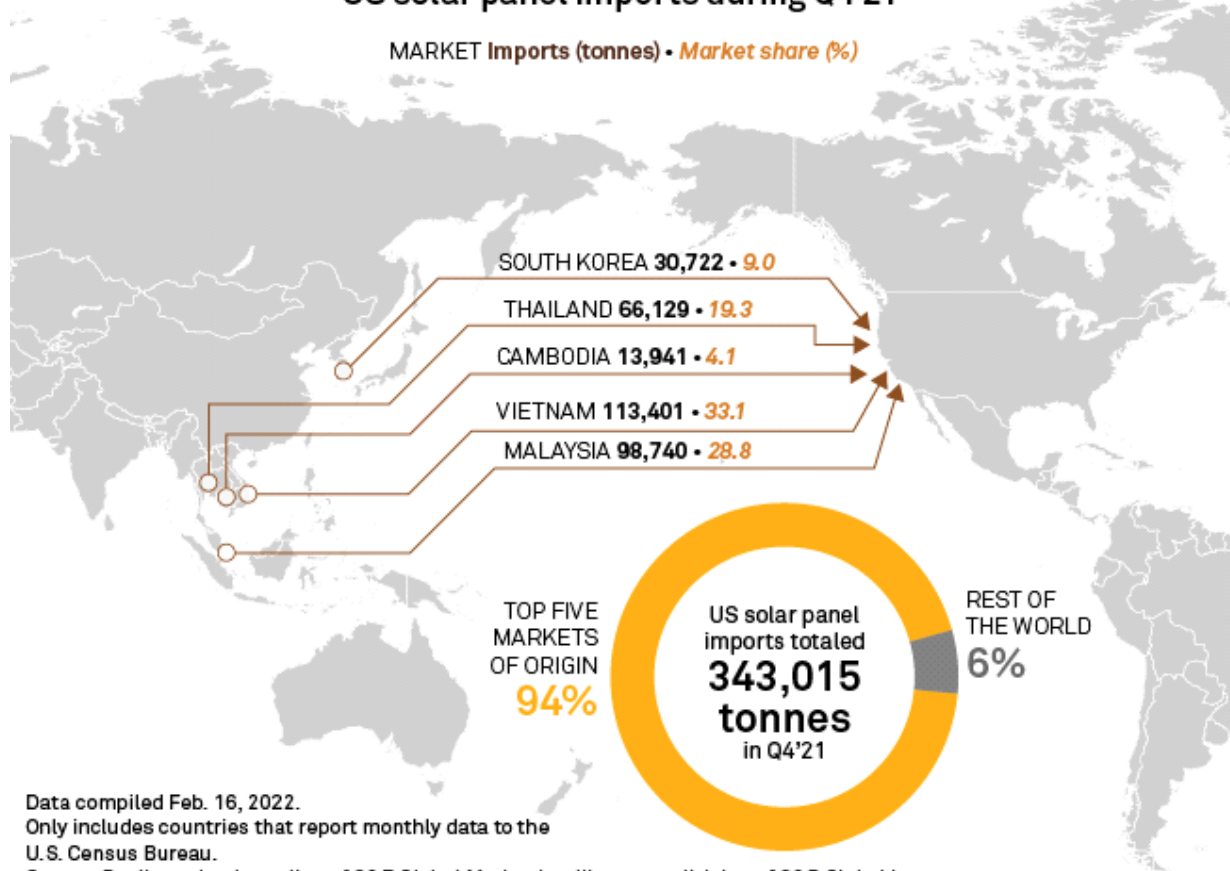
Three-quarters of the 200 U.S. solar companies responding to the survey reported that panel deliveries have been scrapped or pushed out in the wake of the Commerce Department's announcement. The agency is investigating allegations by California-based Auxin Solar Inc. that Chinese producers of crystalline silicon solar cells and modules are evading antidumping and countervailing duties that the Obama administration initially imposed in 2012.

The "disastrous decision" represents a crisis for U.S. solar companies, said Abigail Ross Hopper, CEO of trade group the Solar Energy Industries Association, or SEIA, which conducted the survey. The investigation imperils the Biden administration's efforts to combat climate change as well as "tens of thousands of jobs" and "billions of dollars of investment," the executive said during an April 5 briefing to industry and the media.

The case centers around whether Chinese manufacturers are assembling products in Cambodia, Malaysia, Thailand and Vietnam using parts and components made in China in order to sidestep tariffs. The four Southeast Asian countries accounted for more than 85% of U.S. solar panel imports in the fourth quarter of 2021, according to data from Panjiva, a business line of S&P Global Market Intelligence.

"The damage is real, and the damage is happening right now," Hopper said. "So in this context, we hope that the Department of Commerce and the Biden administration understand the impact this will have on our industry and on their climate ambition. To us, Commerce's actions simply do not make sense."

US solar panel imports during Q4'21



'Sobering assessment'

The SEIA is calling for the agency to issue a negative preliminary determination. An affirmative determination could result in duties being applied retroactively to imports as far back as November 2021, according to Matt Nicely, a partner at Akin Gump Strauss Hauer & Feld LLP, outside legal counsel for the SEIA.

"You would like to think that the Commerce Department would be protecting U.S. industry here where in fact what's happening is that a small module producer is putting the rest of the industry at risk, not only downstream industry but its own module producing industry," Nicely said at the briefing.

More than 90% of U.S. solar companies surveyed said they expected the investigation to result in a "devastating" or "severe" negative impact on their domestic business in 2022, according to a presentation of the results. The closely allied U.S. energy storage industry also expects to take a major hit, with roughly 60% of companies installing batteries indicating a "devastating" or "severe" negative impact to that business as well.

Half of the 200 respondents reported that 80% or more of their 2022 solar project pipelines are at risk. Two-thirds of the companies responding said 50% of their solar and storage workforce is imperiled, while a third reported that their entire workforce is at risk.

"It's a pretty sobering assessment," said John Smirnow, the SEIA's general counsel and vice president of market strategy. "And unfortunately, it's consistent with exactly what SEIA said was going to happen."

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ELECTRIC POWER | ENERGY TRANSITION | METALS — 05 Apr 2022 | 21:33 UTC

US solar industry in 'existential crisis' from Commerce solar tariff investigation



Author [Kassia Micek](#) 
Editor [Valarie Jackson](#) 
Commodity [Electric Power](#), [Energy Transition](#), [Metals](#)

HIGHLIGHTS

Domestic manufacturers expect severe, devastating impacts

The four countries involved provide 84% of US imports

Energy storage components uneconomical without solar

The US Department of Commerce's decision to investigate circumvention tariffs on solar products from Cambodia, Malaysia, Thailand, and Vietnam has already caused the cancellation or delay of solar panel deliveries,

according to 74% of the 200 companies the Solar Energy Industries Association surveyed.

The department initiated the investigation March 28, **four months after the agency rejected a similar petition** that increased solar prices and threatened the livelihoods of tens of thousands of workers, SEIA said. The move threatens the Biden Administration's climate goals.

Commerce "based its case on the industry-killing claims of a single company," SEIA President and CEO Abigail Ross Harper said during an April 5 webinar. "It happened eight days ago and we are already seeing significant impacts [of] this decision."

In two business days, SEIA received 200 responses to its market-impact survey, which shows how swiftly impacts are being felt from the Commerce decision, said Justin Baca, SEIA vice president of markets and research.

The April 5 webinar had over 800 registrants, the most of any SEIA webinar, said John Smirnow, SEIA general counsel and vice president of market strategy.

"This is the biggest threat I've seen in my 15 years in the solar industry," Smirnow said about why the case has garnered so much interest.

CURRENT SOLAR MODULE SUPPLY STATUS



Source: SEIA

Survey results

Solar installment prices have already risen due to supply chain constraints stemming from the coronavirus pandemic. Year-on-year prices have risen across all market segments for three consecutive quarters, leaving utility-scale solar prices 18% higher than a year ago, Baca said.

"About three-fourths of survey respondents have already been told their shipments are delayed or canceled," Baca said, adding another 15% don't know the impact yet while 11% have not been notified. "Across all sectors we see major impacts being felt. Some of these look worse than the comments we got from COVID when projects were shut down. ... The levels of impacts here are still not visible to everyone downstream."

Half of the respondents reported that 80% or more of their current-year solar pipeline is at risk because of the investigation, according to survey results.

Companies expect damage across the value chain with all domestic manufacturers who responded to the survey saying they expect "severe" or "devastating" impacts, according to SEIA. In addition, since most energy storage projects are paired with solar, energy storage components are likely to become uneconomical without the solar components.

US manufacturing is not adequate

US domestic module supply is not adequate and it would take years to build the supply chain needed, Baca said. It takes up to a year or more for siting and permitting a US plant, and an additional one to three years for construction and production, he added.

"This sets us way back from where we need to be to achieve our climate goals," Baca said. "We're not going to replace our supply overnight."

Harsh tariffs lead to job loss, less solar deployment, and provide little benefits to US solar manufacturing, Ross Harper said, adding the "disastrous decision" is causing an "existential crisis" to the US solar industry.

"The damage is real and the damage is happening right now," Ross Harper said. "To us, Commerce actions simply do not make sense. We are calling on the Department of Commerce to immediately issue a negative determination, which essentially means to dismiss the case."

Axion case

Axion Solar, a solar module manufacturer based in California, filed a petition Feb. 8 asking Commerce to initiate an anti-dumping investigation into solar panel imports from Cambodia, Malaysia, Thailand, and Vietnam, which account for 84% of US solar module imports. Axion alleged the solar module parts used in manufacturing by the four countries come from Chinese companies to avoid anti-dumping tariffs.

"We believe the Department of Commerce has enough information to make a decision and make it quickly," Julia Eppard, SEIA counsel with Akin Gump Strauss Hauer & Feld, said about dismissing the case, which is similar to a case Commerce rejected a few months ago.

In a March 7 letter, SEIA requested the department reject the anti-circumventive petition as it "does not meet the minimum requirements for initiation." The investigation would unfairly hit crystalline silicon photovoltaic cells and modules from Cambodia, Malaysia, Thailand, and Vietnam with **duties ranging from 50% to 250%**, according to SEIA.

It is unlikely the US solar industry will hear anything about rates until the preliminary decision is expected Aug. 29, Eppard said.

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

or

xx electronic filing

Docket No. E002/M-20-891

Dated this 8th day of April 2022

/s/

Lynnette Sweet
Regulatory Administrator

[illegible]

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