



August 21, 2017

The Honorable Rhonda K. Schmidlein
Chairman
U.S. International Trade Commission
500 E Street, SW
Washington, DC 20436

Re: Investigation TA-201-75

Dear Chairman Schmidlein:

The Electric Reliability Coordinating Council (ERCC) is a broad coalition of power-generating companies committed to providing diverse, affordable, and reliable electric to millions of consumers throughout the United States. ERCC members have long supported a stable and competitive market for sources of electric power. Suniva's Section 201 petition to place tariffs on solar components runs directly counter to this goal.

Over the last several years, utilities and public power have increasingly diversified their portfolios for a variety of strategic reasons. This diversification has led many power companies to develop solar projects, purchase solar-generated power, or both. As a rule, power companies plan on a 20-year cycle and depend on predictable cost structures, a strategy that helps strengthen their ability to promote grid reliability for their customers. In the context of solar power, company assessments of future power contributions are necessarily based on an analysis of the continued viability of the US solar industry. Imposition of tariffs on imported solar components would significantly dampen the power industry's assessment of future solar generation potential.

In the past several years, the US solar industry has seen immense growth, currently employing some 260,000 American workers. Imposition of trade remedies on solar technology would, in our assessment, fundamentally change the viability of that industry, decreasing its role in expanding the diversity of our nation's energy portfolio. The economics are simple: tariffs would increase the price of key components in solar manufacturing, creating a ripple effect throughout the supply chain that will significantly raise costs and stymie the growth of the industry. These price increases would slash demand for solar energy and disrupt the carefully planned investment decisions of this nation's power providers.

Determining that Suniva was harmed and issuing protective remedies would lead to higher electricity prices, a disruption in the nation's generation mix, or both. Neither of these outcomes advantage this nation's electricity providers or consumers. In order to safeguard the reliability and affordability of the nation's electricity mix, ERCC recommends that ITC reject the Suniva petition.

Sincerely,

Scott H. Segal, Director
Electric Reliability Coordinating Council