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August 21, 2017

Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street SW.
Washington, DC 20436

Re: Statement of Duke Energy Corporation to the United States International Trade Commission
Investigation No. TA-201-75

Dear Secretary Barton:

Pursuant to 19 CFR § 207.26, on behalf of Duke Energy Corporation, I submit the following letter to the U.S. International Trade Commission and request the Commission consider this information in making its determinations in the above-referenced investigation. With respect to this investigation, Duke Energy respectfully requests the Commission consider the potential adverse effects of a finding of injury for the petitioner in this investigation, and any recommendation for an associated remedy of import relief, on the delivered prices of imported Crystalline Silicon Photovoltaic ("CSPV") modules for those industries responsible for powering the nation's electricity sector. Duke Energy urges the Commission to evaluate such potential impacts and avoid making a determination that will negatively disrupt the growing and developing clean energy marketplace within our service territories and throughout the country. Such a disruption potentially harms our customers, our company, our employees and the larger power sector as a whole.

As the Managing Director, Federal Policy for Duke Energy, I am responsible for policy development of all federal government actions impacting our regulated and commercial renewable energy operations. Duke Energy is one of the largest energy providers and electricity-sector employers in the nation, serving approximately 7.5 million retail electric customers in seven states in the Southeastern and Midwestern regions of the country. Duke Energy has approximately 30,000 employees and operates 50,000 megawatts of electricity generation, one of the largest fleets in the nation. Additionally, our commercial operations acquires, develops, builds and operates renewable generation throughout the country, which includes nonregulated renewable energy and storage assets.

As a company, we have invested more than $5 billion in renewable energy, and just within the last five years have procured and invested in approximately 800 megawatts ("MWs") of solar generating facilities, with more than 250 MWs located within our regulated footprint. As prices for solar have declined, more of our large business customers like the military, larger universities and data centers are

seeking to incorporate more solar energy as part of their sustainability or energy security goals. These customers are particularly vital to the economic growth of our communities and identifying economic solutions for them is important to enable them to focus on their core mission. Additionally, over the next five years, we have plans to procure at least 2,500 MW of solar within our regulated jurisdictions, including significant investments in the Carolinas and Florida particularly, where the continued growth of renewable generation is a key tenant of state policy.

As an active market participant in this sector, Duke Energy relies on access to solar CSPV modules at globally-competitive prices to provide cost-competitive solar power to our customers. Competitive module pricing is critical to justify future investment to our regulators and is directly correlated to our ability to grow our renewable portfolio for the benefit of customers and shareholders. Over the next five years, Duke Energy plans to invest more than $1 billion in additional solar generation capacity.

Competitive module pricing has driven the robust growth of solar generation across the country, both for our company and the power sector at large. Historically, demand for solar modules has responded directly to its relative market price and modules typically represent 25% to 30% in the overall installed cost of solar generating capacity. In the event that imported CSPV modules are subject to an artificial floor price or significant import tariff as requested by the petitioners in this case, the module market, and therefore Duke Energy's plans to procure modules, will likely be significantly disrupted. If such a remedial floor price or tariff is imposed, we expect that the installed cost of solar projects will increase 30% or more and that demand for modules would contract, perhaps even precipitously. As solar energy is just approaching parity with the traditional grid resources in a number of states, a significant reduction in demand for new solar projects could deliver a serious blow to continuing development and evolution of this market.

For utilities situated similarly to Duke Energy's operating companies, which must select cost-competitive resources (whether they be fuel-based or renewable) when determining new generation to meet customer demand requirements, such cost increases may eliminate solar generation from its evaluation processes entirely. In this way, the cascading impact of decreases in demand for modules and solar facilities would ultimately harm the very domestic solar manufacturing industry the petitioner is attempting to protect.

Duke Energy urges the Commission to consider the potential adverse effects of a mandate and disruptive change in imported CSPV module price on the power sector. Solar power has become an increasing important part of our generating portfolio and it is an integral element to our future plans to serve our customers. The delivery of reliable, affordable, and increasingly clean energy relies upon international trade policies that increase supply chain stability, not policies that destabilize it.

Respectfully submitted,

Diane V. Denton

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