



May 10, 2022

The Honorable Gina Raimondo
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, D.C. 20230

RE: Anti-Circumvention Investigation Requested by Auxin Solar, Inc.

Dear Secretary Raimondo:

The American Public Power Association (APPA) and Large Public Power Council (LPPC) write to you regarding the Department of Commerce's decision to initiate the circumvention inquiry as requested by Auxin Solar, Inc., in its February 8, 2022, petition regarding the crystalline silicon photovoltaic (CSPV) cells and modules that are assembled in Malaysia, Thailand, Vietnam, and Cambodia. APPA and LPPC respectfully urge the Department of Commerce to reach an expeditious negative determination in this investigation, as a positive determination or a lengthy investigation would jeopardize the solar industry in the United States and raise energy prices for consumers.

APPA is a not-for-profit association representing not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. APPA works to protect the interests of the more than 49 million people that public power utilities serve, and the 96,000 people they employ. APPA advocates and advises on electricity policy, technology, trends, training, and operations.

LPPC is a national organization comprising 27 of the nation's largest public power systems. LPPC's members are locally owned and controlled not-for-profit electric utilities committed to the people and communities they serve. LPPC advocates for policies that allow public power systems to build infrastructure, invest in communities, and provide reliable service at affordable rates. All LPPC members are members of APPA.

APPA and LPPC support the development of a strong domestic solar manufacturing supply chain in the United States. However, the investigation is disrupting the ability of U.S. solar companies that rely on solar panels made in Asia to meet growing demand for this important source of clean electricity. An expansion of tariffs on CSPV solar panels and cells imported from Southeast Asia will hurt U.S. companies, risk the loss of American jobs, impact major solar

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projects pending in the electric sector intended to help reduce greenhouse gas emissions, and ultimately, hurt electric consumers.

For the last several months, public power and other electric utilities have been experiencing shortages of distribution transformers, large power transformers, smart meters, conductor materials, and other necessities. This supply of critical equipment and materials continues to decrease while demand continues to rise, widening the gap between what is available and what is needed, while driving prices up for the available supplies of such critical items. In addition to supply chain constraints, consumers are facing high prices because of, *inter alia*, high inflation and high natural gas prices. As not-for-profit utilities, all the costs incurred by our members are passed along to their customers.

While we support efforts by the Administration to enhance domestic manufacturing and to undertake other practices to increase options for a robust domestic supply chain of necessary electric equipment, including transformers and solar products, we nonetheless urge the Department to make a swift negative determination in this matter that will allow public power utilities to meet their clean energy obligations to their electric customers without further increasing prices in the near-term.

Thank you for your consideration.

Sincerely,



Joy Ditto
President & CEO
American Public Power Association



John Di Stasio
President
Large Public Power Council