

U.S. PRODUCERS' QUESTIONNAIRE

LARGE POWER TRANSFORMERS FROM SOUTH KOREA

This questionnaire must be received by the Commission by **April 17, 2024**
See last page for instructions regarding how to file this questionnaire.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its review of the antidumping duty order concerning large power transformers from South Korea (Inv. No. 731-TA-1189 (Second Review)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm _____
Address _____
City _____ State _____ Zip Code _____
Website _____

Has your firm produced large power transformers (as defined on the next page) at any time since January 1, 2018?

- ☐ **NO** (Sign the certification below and promptly return only this page of the questionnaire to the Commission)
☐ **YES** (Complete all parts of the questionnaire, and return the entire questionnaire to the Commission)

Return questionnaire via the Commission **Drop Box** by clicking on the following link:
<https://dropbox.usitc.gov/oinv/> (PIN: **LPT**). See last page for detailed instructions.

CERTIFICATION

I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings or reviews conducted by the Commission on the same or similar merchandise.

I, the undersigned, acknowledge that information submitted in response to this request for information and throughout this proceeding or other proceedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. I understand that all contract personnel will sign appropriate nondisclosure agreements.

Name of Authorized Official

Title of Authorized Official

Date

Signature

Phone

Email address

PART I.—GENERAL INFORMATION

Background.--On August 31, 2012, the Department of Commerce ("Commerce") issued an antidumping duty order on imports of large power transformers from South Korea. On September 1, 2023, the Commission instituted a review pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the order would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the order will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will revoke the order. Pertinent information to this proceeding are available at:

Questionnaires: https://usitc.gov/reports/active_import_injury_questionnaires.

Other case information: <https://ids.usitc.gov/case/3269/investigation/8433>

Large power transformers covered by this proceeding are large liquid dielectric power transformers (LPTs) having a top power handling capacity greater than or equal to 60,000 kilovolt amperes (60 megavolt amperes), whether assembled or unassembled, complete or incomplete.

Incomplete LPTs are subassemblies consisting of the active part and any other parts attached to, imported with or invoiced with the active parts of LPTs. The "active part" of the transformer consists of one or more of the following when attached to or otherwise assembled with one another: the steel core or shell, the windings, electrical insulation between the windings, the mechanical frame for an LPT.

The product definition encompasses all such LPTs regardless of name designation, including but not limited to step-up transformers, step-down transformers, autotransformers, interconnection transformers, voltage regulator transformers, rectifier transformers, and power rectifier transformers.

Large power transformers are currently imported under statistical reporting numbers 8504.23.0045, 8504.23.0080, 8504.90.9634, 8504.90.9638, 8504.90.9642, and 8504.90.9646 of the Harmonized Tariff Schedule of the United States (HTSUS). The HTSUS provisions are for convenience and customs purposes; the written description of the scope is dispositive.

MVA top rated.--The top power handling capacity in megavolt amperes.

Reporting of information.--If information is not readily available from your records in exactly the form requested, furnish carefully prepared estimates. If your firm is completing more than one questionnaire in connection with this proceeding (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions in the questionnaires.

Confidentiality.--The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. § 1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

Verification.--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all of your files, worksheets, and

supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

Release of information.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

D-GRIDS tool.--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage (https://www.usitc.gov/trade_remedy/question.htm) called the "D-GRIDS tool." Use of this tool to help your firm complete this questionnaire is optional. Firms opting to use the D-GRIDS tool to populate their data into this questionnaire will need the D-GRIDS specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDS tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDS tool are available within the D-GRIDS tool itself.

I-1. **Reporting requirements.**--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire for use by the Office of Management and Budget.

Hours	Dollars

Public reporting burden for this questionnaire is estimated to average 55 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this questionnaire. Please provide such comments to the Office of Investigations, import_injury@usitc.gov.

- I-2a. **Establishments covered.**--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. **Firms operating more than one establishment should combine the data for all establishments into a single report.**

“Establishment”--Each facility of a firm involved in the production of large power transformers, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments Covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			
¹ Additional discussion on establishments consolidated in this questionnaire: _____			

- I-2b. **Stock symbol information.**-- If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: _____.

- I-2c. **External counsel.**-- If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

- I-3. **Position regarding continuation of order.**--Does your firm support or oppose continuation of the antidumping duty order currently in place for large power transformers?

Country	Order type	Support	Oppose	Take no position
South Korea	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I-4. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

☐ No ☐ Yes--List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (percent)

“Related firm”—A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

- I-5. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing large power transformers into the United States or that are engaged in exporting large power transformers to the United States?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation

- I-6. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of large power transformers?

☐ No ☐ Yes--List the following information.

[illegible]

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Stamen Borisson (202-205-3125, Stamen.Borisson@usitc.gov). **Supply all data requested on a calendar-year basis.**

II-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in Part II.

Name	
Title	
Email	
Telephone	

II-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of large power transformers since January 1, 2018.

<i>Check as many as appropriate.</i>		<i>If checked, please describe the nature, timing / duration, and impact on operations of any such reported changes as well as the business reasons for them; leave completely blank if not applicable</i>
<input type="checkbox"/>	Plant openings	
<input type="checkbox"/>	Plant closings	
<input type="checkbox"/>	Prolonged shutdowns	
<input type="checkbox"/>	Production curtailments	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Weather-related or force majeure events	
<input type="checkbox"/>	Other (e.g., revised labor agreements, technology)	

- II-2b. **COVID-19 pandemic.**—Has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your firm's supply chain arrangements, production, employment, and shipments relating to large power transformers? In your response, please discuss the duration and timing of any such changes as they relate to your firm's operations.

No	Yes	If yes, describe these changes including the impact over time on the (a) supply chain, (b) production and shipments, and (c) employment with respect to large power transformers.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-2c. **Anticipated changes in operations.**—Does your firm anticipate any changes in the character of its operations or organization relating to the production of large power transformers in the future?

No	Yes	If yes, supply details as to the likely timing, nature, and significance of such anticipated changes and describe the underlying assumptions and business reasons for these anticipated changes. Include in your response a specific projection of your firm's capacity to produce large power transformers (in MVA top rated) for 2024 and 2025, as well as whether any anticipated changes include plans to move production of particular large power transformers to facilities outside of the United States.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-3a. **Explanation of firm's domestic activities.** —Please describe in detail your firm's domestic operations with respect to manufacturing large power transformers, including, if applicable, incorporation of imported or purchased subassemblies (including active parts or the cores, windings, or mechanical frames of active parts not already assembled into an LPT) into an LPT in the United States.

--

- II-3b. **Domestic activities by factor.** —Please describe the nature and extent of the following items in relation to your firm's manufacturing of large power transformers, including, if applicable, incorporation of imported or purchased subassemblies (including active parts or the cores, windings, or mechanical frames of active parts not already assembled into an LPT) into an LPT in the United States.

Capital investments	
Technical expertise	
Value added	
Employment	
Quantity, type, and source of parts	
Costs and activities	

- II-3c. **Operations' complexity and importance.** —On a scale of 1 to 5, please provide your firm's subjective opinion as to the complexity, intensity, and importance of your firm's large power transformers operations, with 1 being minimally complex, intense, or important and 5 being extremely complex, intense, or important.

1: Minimally complex, intense, and important	2	3	4	5: Extremely complex, intense, and important
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please describe the reason for your rating below.				

- II-3d. **Purchases and/or imports of incomplete LPTs for use in domestic finishing operations:** If your firm purchased and/or imported incomplete LPTs (i.e., steel core or shell, the windings, electrical insulation between the windings, the mechanical frame for an LPT) for purposes of producing a finished LPT in the United States, please report the quantity and value of such purchases and/or imports used for this production activity during the specified periods.

(Quantity in MVA top rated for the finished good) and value (in \$1,000)			
Item	Calendar year		
	2021	2022	2023
Purchases/imports of incomplete LPTs for production activities in the United States:			
Quantity			
Value			

- II-4a. **Production using same machinery.**--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce large power transformers, and the combined capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

"Installed overall capacity" – The level of production that your establishment(s) could have attained, assuming your firm's *optimal* product mix, and based solely on *existing capital investments*, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does not take into account other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity.

"Practical overall capacity" – The level of production that your establishment(s) could reasonably have expected to attain, taking into account your firm's *actual* product mix over the period. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate; but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) your firm's existing in place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited your firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production your firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

"Practical large power transformers capacity" – The level of production of large power transformers that your establishment(s) could reasonably have expected to attain. The same assumptions apply to this capacity measure as for practical overall capacity, but only includes the portion of practical overall capacity allocated to the production of large power transformers based on the actual product mix experienced over the period.

Takes into account	Installed overall capacity	Practical overall capacity	Practical large power transformers capacity
Existing capital investments	Yes	Yes	Yes
Product mix	Yes	Yes	Yes
Normal downtime, maintenance, repair and clean-up	No	Yes	Yes
Existing labor force	No	Yes	Yes
Availability of material inputs	No	Yes	Yes
Actual number of shifts and hours operated	No	Yes	Yes
Limited to large power transformers	No	No	Yes

"Production" – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

II-4a. Production using same machinery.—Continued

Quantity (in MVA top rated)			
Item	Calendar year		
	2021	2022	2023
Capacity measures:			
Installed overall capacity ¹			
Practical overall capacity ^{1 2}			
Practical large power transformers capacity ^{3 4}	0	0	0
Production of:			
Large power transformers ^{3 4}	0	0	0
Other products ⁵			
Total production using same machinery or workers	0	0	0

¹ Data reported for both "installed overall" and "practical overall" capacity should each individually be greater than data reported for total production (last line). Additionally, data reported for "installed overall" capacity should be greater than "practical overall" capacity in every period.

² Please provide details in your response to the question on capacity constraints in question II-3d below that explain the differences reported between "installed" overall capacity and "practical" overall capacity.

³ Data for this indicator will populate here once reported below in question II-10a.

⁴ Data reported for practical large power transformers capacity should be greater than the data reported for production of large power transformers in each period, if not revise prior to submission to the Commission. Additionally, if your firm reports the production of no other products on the same machinery and using the same workers as large power transformers then "practical overall" and "practical large power transformers" capacity measures should be equal to each other.

⁵ Please identify these products: _____.

II-4b. **Operating parameters.**--The ***practical*** overall capacity reported in II-4a is based on the following operating parameters:

Hours per week	Weeks per year

II-4c. **Capacity calculations.**--Please describe the methodology used to calculate ***installed*** and ***practical*** overall capacities reported in II-4a, and explain any changes in reported capacities.

--

II-4d. **Practical overall production constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's practical overall capacity over the period reported in question II-4a. If different constraints were binding over different periods reported, please specify when each constraint was limiting your reported practical overall capacity. If a constraint was not actually binding over the period reported, but was still a constraint to achieving the installed capacity level, indicate at what level it would have been binding.

Constraint <i>(check as many as appropriate)</i>		Description <i>(If checked, please describe the details, timing, and duration of the constraint; leave completely blank if not applicable)</i>
<input type="checkbox"/>	Production bottlenecks	
<input type="checkbox"/>	Existing labor force	
<input type="checkbox"/>	Supply of material inputs	
<input type="checkbox"/>	Fuel or energy	
<input type="checkbox"/>	Storage capacity	
<input type="checkbox"/>	Logistics/transportation	
<input type="checkbox"/>	Other constraints (list the specific constraints in the description field)	

- II-4e. **Reaching installed overall capacity.**--Please describe and quantify the amount of time it would take and the additional actions that would be needed (e.g., hiring new workers, expanding shifts, procuring larger sources of raw material supply, etc.) for your firm to be able to fully utilize the reported installed overall capacity reported in II-4a.

--

- II-4f. **Excess capacity.**--To the extent that your company is reporting excess capacity, please report, with specificity: (1) which machines or equipment (or other elements of production) would need to be brought back into production for your plant to operate at full capacity, and (2) the specific dates on which such machines or equipment were last used by your plant to produce large power transformers.

--

- II-4g. **Efficiency gains.**--Have there been changes to the technology used in the production of large power transformers that have resulted in efficiency gains in your firm's large power transformers since January 1, 2018?

No	Yes	If yes—Please describe these efficiency gains.
<input type="checkbox"/>	<input type="checkbox"/>	

II-5a. **Production capability and actual production of large power transformers with 500-799 MVA (top-rated).**—Indicate whether your firm has and/or is able to produce large power transformers with an MVA (top-rated) of 500 to 799.

Item	(Check one)	Explanation
Able to produce and actually produced	<input type="checkbox"/>	Indicate the quantity produced (in units) during 2021 to 2023: _____.
Able to produce, but did not actually produce	<input type="checkbox"/>	Indicate the reasons your firm did not produce large power transformers with an MVA (top-rated) of 500 to 799 despite having the technical capabilities to do so: _____.
Not able to produce	<input type="checkbox"/>	Indicate the technical reasons your firm is unable to produce large power transformers with an MVA (top-rated) of 500 to 799 with your existing capital investments: _____.

II-5b. **Production capability and actual production of large power transformers with 800+ MVA (top-rated).**—Indicate whether your firm has and/or is able to produce large power transformers with an MVA (top-rated) of 800 or greater.

Item	(Check one)	Explanation
Able to produce and actually produced	<input type="checkbox"/>	Indicate the quantity produced (in units) during 2021 to 2023: _____.
Able to produce, but did not actually produce	<input type="checkbox"/>	Indicate the reasons your firm did not produce large power transformers with an MVA (top-rated) of 800 or greater despite having the technical capabilities to do so: _____.
Not able to produce	<input type="checkbox"/>	Indicate the technical reasons your firm is unable to produce large power transformers with an MVA (top-rated) of 800 or greater with your existing capital investments: _____.

II-6. Product shifting.—

- (a) Is your firm able to switch production (capacity) between large power transformers and other products using the same equipment and/or labor?

No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) Please describe the factors that affect your firm's ability to shift capacity between products (e.g., time, cost, relative price change, qualification or lack thereof, etc.), and the degree to which these factors enhance or constrain such shifts.

--

II-7. Geographic location shifting.—

- (a) Is your firm able to switch production (capacity) between large power transformers produced in the United States and large power transformers produced in other countries for purposes of supplying large power transfers to your U.S. customers?

No	Yes	If yes.-- Please identify the other geographic locations of production for large power transformers. Include in this discussion whether certain large power transformers are only available from certain sources (e.g., 300 to 499, 500 to 799, 800 or greater highest rated MVA large power transformers).
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) Please describe the factors that affect your firm's ability to shift sources of supply for large power transforms (i.e., between U.S.-produced and other than U.S.-produced large power transformers), and the degree to which these factors enhance or constrain such shifts.

--

II-8. **Capacity checklist.**--Please check that the capacity numbers reported in question II-4a follow the Commission's relevant definitions for capacity.

Item	√ if Yes
Are all three capacity measures reported based on <u>currently installed machinery and equipment</u> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	<input type="checkbox"/>
Are practical overall capacity and practical large power transformers capacity measures reported based on <u>existing labor force</u> (i.e., the reported capacity level would not require hiring additional production related workers or adding shifts)?	<input type="checkbox"/>
Are practical overall capacity and practical large power transformers capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical large power transformers capacity measures account for <u>normal downtime, maintenance, repair and clean-up</u> activities?	<input type="checkbox"/>
Does the difference between practical overall capacity and practical large power transformers capacity equal the portion of practical overall capacity that is dedicated to the production of out-of-scope products?	<input type="checkbox"/>

Note: If your firm is not able to answer "yes" to any of the above criteria as it relates to your firm's reported capacity levels, please revise your capacity numbers to be in conformance with the appropriate definition prior to submission to the Commission.

- II-9a. **Shipments and inventory data.**--Report you firm's uses (shipment or storage) of domestically produced large power transformers during the specified periods.

"Production" – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

"Commercial U.S. shipments" –Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

"Internal consumption" – Product consumed internally by your firm. Such transactions are valued at fair market value.

"Transfers to related firms" –Shipments made to related firms. Such transactions are valued at fair market value.

"Related firm" –A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

"Export shipments" –Shipments to destinations outside the United States, including shipments to related firms.

"Inventories"— Finished goods inventory, not raw materials or work-in-progress.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the trade data, as Commission staff may contact your firm regarding questions on the trade data. The Commission may also request that your company submit copies of the supporting documents/records (such as production and sales schedules, inventory records, etc.) used to compile these data.

II-9a. **Production, shipment, and inventory data.** --Continued

Quantity (in MVA top rated) and value (in \$1,000)			
Item	Calendar year		
	2021	2022	2023
Practical large power transformers capacity¹ (quantity) (A)			
Beginning-of-period inventories (quantity) (B)			
Production (quantity) (C)			
U.S. shipments:			
Commercial shipments:			
Quantity (D)			
Value (E)			
Internal consumption:²			
Quantity (F)			
Value (G)			
Transfers to related firms:¹			
Quantity (H)			
Value (I)			
Export shipments:³			
Quantity (J)			
Value (K)			
End-of-period inventories (quantity) (L)			

¹ Report your firm's practical large power transformers capacity consistent with the definitions and instructions included in question II-4a.

² Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): _____. However, the data provided above in this table should be based on fair market value.

³ Identify your firm's principal export markets: _____.

II-9a. Production, shipment, and inventory data.--Continued

***RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.**--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and, also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.*

Item	Calendar year		
	2021	2022	2023
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. ¹	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.			

II-9b. Historical U.S. shipment data. --Report the quantity and value of your firm's U.S. shipments (including commercial U.S. shipments, internal consumption, and transfers, but not including exports) of large power transformers produced in your U.S. establishment(s) during the specified periods.

Quantity (<i>in MVA top rated</i>); Value (<i>in 1,000 dollars</i>)			
Item	2018	2019	2020
Historical U.S. shipments			
<i>Quantity</i>			
<i>Value</i>			

- II-10. **Channels of distribution.**--Report your firm's U.S. shipments of U.S.-produced large power transformers (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution during the specified periods.

Quantity (in MVA top rated)			
Item	Calendar year		
	2021	2022	2023
U.S. shipments to:			
Distributors (M)			
Utilities (N)			
Engineering procurement and construction companies and/or developers (O)			
Other end users (P) ¹			
¹ Please describe these other end users: .			

RECONCILIATION OF CHANNELS.--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, O and P) in each time period equal the quantity reported for U.S. shipments (i.e., lines D, F, and H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation item	Calendar year		
	2021	2022	2023
M + N + O + P – D – F – H = zero ("0"), if not revise.	0	0	0

- II-11. **U.S. shipments by MVA rating.**-- Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced large power transformers by top MVA rating during the specified periods.

Quantity (as specified in table) and value (in \$1,000)			
Item	Calendar year		
	2021	2022	2023
U.S. shipments of			
Top MVA rating of 60-299:			
Quantity (in MVA top rated) (Q)			
Quantity (in units) (R)			
Value (S)			
Top MVA rating of 300-499:			
Quantity (in MVA top rated) (T)			
Quantity (in units) (U)			
Value (V)			
Top MVA rating of 500-799:			
Quantity (in MVA top rated) (W)			
Quantity (in units) (X)			
Value (Y)			
Top MVA rating of 800+:			
Quantity (in MVA top rated) (Z)			
Quantity (in units)(AA)			
Value (AB)			

RECONCILIATION OF US SHIPMENTS.-- Please ensure that the quantity (in MVA top rated) and value of U.S. shipments reported in each full year in question II-9a (i.e., lines D through I) match the quantity (in MVA top rated) and value of U.S. shipments reported here (i.e., lines, Q,S, T,V, W, Y, Z, and AB). If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission.

Reconciliation for	Calendar year		
	2021	2022	2023
Quantity (in MVA top rated): $Q + T + W + Z - F - H - J = \text{zero ("0")}$, if not revise.	0	0	0
Value: $S + V + Y + AB - G - I - K = \text{zero ("0")}$, if not revise.	0	0	0

- II-12. **Employment data.**--Report your firm's employment-related data related to the production of large power transformers in your U.S. establishments and provide an explanation for any trends in these data.

"Production and Related Workers" (PRWs) includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12.

"Hours worked" includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

"Wages paid"—Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

Item	Calendar year		
	2021	2022	2023
Employment data:			
Average number of PRWs (<i>number</i>)			
Hours worked by PRWs (<i>1,000 hours</i>)			
Wages paid to PRWs (<i>\$1,000</i>)			

Explanation of trends:

--

- II-13. **Transfers to related firms.**--If your firm reported transfers to related firms in question II-9a, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

--

- II-14. **Purchases.**--Has your firm purchased large power transformers produced in the United States or in other countries since January 1, 2021? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire).

"Purchase" – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

"Import" – A transaction to buy from a foreign supplier where your firm is the importer of record.

No	Yes	If yes-- Report such purchases in the table below and explain the reasons for your firms' purchases:
<input type="checkbox"/>	<input type="checkbox"/>	

Note: If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below.

Quantity (in MVA top rated)			
Item	Calendar year		
	2021	2022	2023
Purchases from U.S. importers of large power transformers from— South Korea			
All other sources ¹			
Purchases from domestic producers ²			
Purchases from other sources ³			
¹ Please list the source country and the name of the nonsubject importer(s) from which your firm purchased this product: _____. ² Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. ³ Please list the name of the firm(s) from which your firm purchased this product: _____.			

- II-15. **Purchases of imports from subject sources.**--If your firm reported purchases from U.S. importers of large power transformers from South Korea at any time since January 1, 2021, report those purchases by the individual importer of record and subject source.

Purchases of subject imports

Quantity (in MVA top rated)			
Importer of record	Calendar year		
	2021	2022	2023
Grand total:	0	0	0

RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES.--Please ensure that the quantities reported for your firm's purchases of imports from subject sources reported in this question (i.e., "total purchases of imports from subject sources") in each time period equal the quantity reported for your firm's purchases from subject sources in each time period in the previous question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year		
	2021	2022	2023
Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise.	0	0	0

II-16a. **Imports**--Since January 1, 2018, has your firm imported large power transformers?

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	
If yes-- <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>		

II-16b. **Imports by a related firm**--Since January 1, 2018, has a firm affiliated with your firm imported large power transformers?

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	
If yes-- <u>HAVE YOUR RELATED FIRM COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>		

II-16c. **Import facilitation**--In 2023, has your firm facilitated or otherwise been involved in the sale or importation of a large power transformer produced by your firm in a foreign facility, or a foreign firm affiliated with your firm for which your firm did not serve as the U.S. importer of record?

No	Yes	If yes please identify (1) the producer(s) of the LPTs; (2) the country in which the producer(s) is/are located; (3) the quantity of LPT, in MVA (top rated); (4) the value of the LPT in \$1,000 dollars; and (5) delivery year of the LPT.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-17. **Toll production.**--Since January 1, 2018, has your firm been involved in a toll agreement regarding the production of large power transformers?

“Toll agreement”-- Agreement between two firms whereby the first firm (“tollee”) furnishes the raw materials and the second firm (“toller”) uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	If yes—Please complete the table below
<input type="checkbox"/>	<input type="checkbox"/>	

Does your firm act as the toller or tollee in this arrangement?	Toller: <input type="checkbox"/>	Tollee: <input type="checkbox"/>
Report the share of your firm’s production of large power transformers that was included in this toll arrangement in 2023.		%
Please describe the activities performed in this tolling arrangement:		
Please indicate the name(s) of the firm(s) involved:		

- II-18. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce large power transformers in and/or admit large power transformers into a foreign trade zone (FTZ)?

“Foreign trade zone” is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	Yes	If yes-- Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) **Other firms' FTZ operations.**--To your knowledge, do any firms in the United States import large power transformers into a foreign trade zone (FTZ) for use in distribution of large power transformers and/or the production of downstream articles?

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-19. **Effect of order.**--Describe the significance of the existing antidumping duty order covering imports of large power transformers from South Korea in terms of its effect on your firm's capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the imposition of the order.

--

- II-20. **Likely impact of revocation.**--Would your firm anticipate any changes in the character of its operations or organization, including its capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of large power transformers in the future if the antidumping duty order on large power transformers from South Korea were to be revoked?

No	Yes	If yes, supply details as to the time, nature, and significance of such anticipated changes and describe underlying assumptions and business reasons for them.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-21. **Other explanations:**--If your firm would like to explain further a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to David Boyland (202-708-4725, David.Boyland@usitc.gov).

- III-1. **Contact information.**—Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in Part III.

Name	
Title	
Email	
Telephone	

- III-2. **Accounting system.**—Briefly describe your firm's financial accounting system.

- A.1. When does your firm's fiscal year end (month and day)? _____
If your firm's fiscal year changed since January 1, 2021, explain below:

- A.2. Note: Calendar-year data are required for the annual-year financial data in this section (i.e., in questions III-9a, III-9d, III-12a, and III-13a). However, if providing this data on a calendar-year basis is unduly burdensome or provides results that are not reliable, fiscal-year based data are acceptable. Please indicate whether the results in this section are provided on a calendar-year basis (including firms with a calendar-year based fiscal year) or on a fiscal-year basis that does not align with the calendar year.

☐ Calendar-year basis ☐ Fiscal-year basis (does not align with the calendar year)

- B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include large power transformers:

- B.2. Does your firm prepare profit/loss statements for large power transformers:

☐ Yes ☐ No

- B.3. Please indicate the type and frequency (if applicable) of financial statements prepared by your firm. Please check relevant items below.

Financial statements	Check all that apply	Frequency			
		Monthly	Quarterly	Semi-annually	Annually
Audited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unaudited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual reports	<input type="checkbox"/>				
SEC Forms 10-K / 10-Q	<input type="checkbox"/>				
SEC Form 20-F	<input type="checkbox"/>				
Other (specify): _____	<input type="checkbox"/>				

B.4. Please indicate the primary accounting basis used by your firm.

Accounting basis	Check one
U.S. GAAP	<input type="checkbox"/>
IFRS	<input type="checkbox"/>
Tax – cash	<input type="checkbox"/>
Tax – accrual	<input type="checkbox"/>
Other (specify): _____	<input type="checkbox"/>

B.5. Please report the revenue recognition method(s) used by your firm and the share of total large power transformers sales accounted for by each revenue recognition method in 2023.

Item	Calendar year
	2023
Share of large power transformers sales by revenue recognition method	
Date of delivery	
Based on milestones specified in sales contract ¹	
Other ²	
Total (should sum to 100.0 percent)	0
¹ When revenue is recognized incrementally based on milestones, please describe the most common milestones:	
² If not specified above, please describe the revenue recognition method(s) used:	

III-3. **Cost accounting system.**—Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

--

III-4. **Product listing.**—Please list the products your firm produces in the facilities in which it produces large power transformers, and provide the share of net sales accounted for by these products in 2023.

Products	Share of sales in 2023
large power transformers (60-299 MVA)	%
large power transformers (300-499 MVA)	%
large power transformers (500+ MVA)	%
	%
	%
	%

- III-5. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of large power transformers from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

☐ Yes--Continue to question III-6. ☐ No--Continue to question III-8.

- III-6. **Inputs from related suppliers.**—Please identify the inputs used in the production of large power transformers that your firm purchases from related suppliers and that are reflected in question III-9a. For “Share of total COGS” please report this information by relevant input for 2023.

Input	Related supplier	Share of total COGS in 2023
		%
		%
		%
		%

- III-7a. **Valuation method used for inputs from related suppliers.**—Please indicate the purchase cost valuation method used for the inputs from related suppliers, as recorded in the company’s own accounting system. If the basis differs by input, please check all that apply and explain further in the narrative box.

Purchase cost valuation method	Check all that apply
Related supplier’s cost	<input type="checkbox"/>
Cost plus	<input type="checkbox"/>
Negotiated transfer price to approximate fair market value	<input type="checkbox"/>
Other (specify): _____	<input type="checkbox"/>
If the methods used differ by input, please describe:	

- III-7b. **Inputs from related suppliers valuation method.**—Please confirm that the inputs purchased from related suppliers, as identified in III-6, were reported in III-9a (financial results on large power transformers) in a manner consistent with the firm’s accounting books and records.

Yes	No	If no—Provide an explanation and the valuation basis used for these inputs in question III-9a.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-8. **Cost assignment/allocation basis.**— Briefly describe the assignment/allocation bases used by your firm to assign the costs and expenses listed below for large power transformers in the normal course of business and in the financial results reported in question III-9a (e.g., actual costs, standard costs, percentage of COGS, percentage of sales, etc.).

Cost/expense	Assignment/allocation bases used for large power transformers—	
	In the normal course of business	In the financial results at III-9a
Raw materials		
Direct labor		
Other factory costs		
SG&A expenses		
Interest expense		
Other income/expenses		

- III-9a. **Operations on large power transformers.**—Report the revenue and related cost information requested below on the large power transformers operations of your firm's U.S. establishment(s). Include only sales (whether domestic or exports) and costs related to your U.S. manufacturing operations. Do not report any revenue or cost data related to the resale of purchased product.

Net sales—Report all commercial sales, internal consumption, and transfers to related firms, whether these are domestic sales or exports. Report net sales values less discounts, returns, allowances, and prepaid freight, in U.S. dollars, f.o.b. your point of shipment. The freight costs associated with delivering the product to your customer should not be included.

Note: If the financial data are reported on a calendar-year basis, the total net sales quantities and values should match the total shipment quantities and values reported in Part II of this questionnaire.

Internal consumption—Product consumed internally by your firm. Report internal consumption at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

Transfers to related firms—Sales made to related firms. Report transfers to related firms at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

Costs and expenses—Include costs and expenses associated with all reported net sales (i.e., for both domestic and export commercial sales, internal consumption, and transfers to related firms). If any freight costs were removed from net sales values, ensure the associated costs are removed from the applicable cost/expense line.

Inputs from related suppliers—Any inputs purchased from related suppliers should be reported in a manner consistent with your firm's accounting books and records.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes large power transformers, as well as specific statements and worksheets) used to compile these data.

III-9a. **Operations on large power transformers.—Continued**

Quantity (<i>in MVA top rated</i>) and value (<i>in \$1,000</i>)			
Item	Calendar year		
	2021	2022	2023
Net sales quantities:			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales quantities	0	0	0
Net sales values:			
Commercial sales			
Internal consumption			
Transfers to related firms			
Total net sales values	0	0	0
Cost of goods sold (COGS):			
Raw materials			
Direct labor			
Other factory costs			
Total COGS	0	0	0
Gross profit or (loss)	0	0	0
SG&A expenses			
Operating income (loss)	0	0	0
Other expenses and income:			
Interest expense			
All other expense items			
All other income items			
Net income or (loss) before income taxes	0	0	0

III-9b. **Financial data reconciliation.**—Certain line items from question III-9a, including total net sales quantities and values, total COGS, gross profit (or loss), operating profit (or loss), and net income (or loss), have been calculated based on the data submitted for other line items. Are the data in these calculated line items correct according to your firm's financial records ignoring non-material differences that may arise due to rounding?

		<p>If no--If the calculated line items do not show the correct data, please double check the feeder data for data entry errors and revise.</p> <p>Also, check signs accorded to the post operating income line items. The two expense line items should report positive numbers (i.e., expenses are positive, and incomes or reversals are negative in these lines – instances of the latter should be rare in these lines). The income line item should also, in most instances, be a positive number (i.e., income is positive, and expenses or reversals are negative in this line).</p> <p>If, after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated line items persist, please identify and discuss the differences in the space below.</p>
Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	

III-9c. **Raw materials.**—Please report the share of total raw material costs in 2023 (reported in III-9a) for the following raw material inputs:

Input	Share of total raw material costs (percent)	Procurement method	
		Primarily produced by your firm	Primarily purchased by your firm
Domestic-origin incomplete LPTs		NA	X
Foreign-origin incomplete LPTs		NA	X
Bushings		<input type="checkbox"/>	<input type="checkbox"/>
Controls and other accessories ¹		<input type="checkbox"/>	<input type="checkbox"/>
Dielectric mineral oil (or equivalent)		<input type="checkbox"/>	<input type="checkbox"/>
Grain oriented silicon electrical steel		<input type="checkbox"/>	<input type="checkbox"/>
Steel plate		<input type="checkbox"/>	<input type="checkbox"/>
Tap changers		<input type="checkbox"/>	<input type="checkbox"/>
Windings		<input type="checkbox"/>	<input type="checkbox"/>
Other material inputs ²		<input type="checkbox"/>	<input type="checkbox"/>
Total (should sum to 100 percent)	0.0		
¹ If you reported a figure for “Controls and other accessories,” please explain below how you define the term “accessories” for purposes of responding to this question: ² If there are notable or significant raw material inputs included within the “Other material inputs” category, please list those here and provide the share of the total raw material costs for which they account:			

III-9d. **Depreciation expense.**—Please report the amount of depreciation expense that is included within the reported financial results at question III-9a.

Item	Calendar year		
	2021	2022	2023
Depreciation expense (in \$1,000)			

III-9e. **Depreciation expense classification.**—Please indicate the line item(s) within question III-9a (e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense reported above.

--

III-10a. **Nonrecurring items (charges and gains) included in the large power transformers financial results.**—Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at question III-9a. If a nonrecurring item that is not product-specific was allocated to the results at question III-9a, please report the allocated value, below, rather than the aggregate amount.

Note: The Commission's objective here is to gather information on material (significant) nonrecurring items which impacted the reported financial results for large power transformers in question III-9a.

Item	Calendar year		
	2021	2022	2023
	Value (\$1,000)		
Nonrecurring item 1			
Nonrecurring item 2			
Nonrecurring item 3			
Nonrecurring item 4			
Nonrecurring item 5			
Nonrecurring item 6			
Nonrecurring item 7			

III-10b. **Nonrecurring items (charges and gains) included in the large power transformers financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question III-9a in which the nonrecurring item is classified.

Item	Description of the nonrecurring item	Location (i.e., line item) within question III-9a
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**—If non-recurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business, just as responses to question III-10 identify the specific line items in question III-9a where these items are reported.

--

III-12a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of large power transformers. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for large power transformers in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations used in question III-9a.

Note: Total assets should reflect the net amount of assets (i.e., after any accumulated depreciation and allowances deducted) and should be allocated to large power transformers if these assets are also related to other products.

Value (in \$1,000)			
Item	Calendar year ended		
	2021	2022	2023
Total assets (net)			

III-12b. **Description of asset values.**—Please provide explanations for any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) included in the above response.

--

III-13a. **Capital expenditures and research and development (“R&D”) expenses.**—Report your firm’s capital expenditures and research and development expenses for large power transformers.

Value (in \$1,000)			
Item	Calendar year		
	2021	2022	2023
Capital expenditures			
R&D expenses			

III-13b. **Description of reported capital expenditures.**—Please describe the nature, focus, and significance of your firm’s reported capital expenditures. If no capital expenditure data were reported, please explain the reason.

--

III-13c. **Description of reported R&D expenses.**—Please describe the nature, focus, and significance of your firm’s reported R&D expenses.

--

III-14a. **Data consistency and reconciliation.**—The quantities and values of total net sales reported in question III-9a should reconcile with the total shipments reported in question II-8a (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis.

If the calculated fields below return values other than zero (i.e., "0") this indicates the total net sales quantities and values do not match the total shipments quantities and values.

Reconciliation	Calendar year		
	2021	2022	2023
Quantity: Trade data from question II-8a (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0
Value: Trade data from question II-8a (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0

Is the financial data in question III-9a reported on a calendar-year basis?

☐ Yes— Complete question III-14b.

☐ No— Complete question III-15

III-14b. **Data consistency and reconciliation (calendar-year based financial data).**—Do the data in question III-9a reconcile with the data in question II-8a (i.e., the calculated fields are returning zeros in the table above) for all periods?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

III-15. **Other explanations.**—If your firm would like to further explain a response to a question in Part III for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Hau Nguyen (202-708-1441, hau.nguyen@usitc.gov).

- IV-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in Part IV.

Name	
Title	
Email	
Telephone	

- IV-2. How often do transactions or sales require your firm to go through a qualification process or enter a blanket agreement, as a condition to bid on a particular project?

Item	Always	Frequently	Sometimes	Rarely/Never
Qualification process required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Blanket agreement required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- IV-3. **Bid opportunities and competition.**—

- (a) How often is there more than one chance to bid on a particular sales agreement?

Always	Frequently	Sometimes	Rarely/Never
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) If your response is Sometimes, Frequently, or Always, please provide an explanation for which there were multiple chances to bid on a particular sales agreement.

--

- (c) How often does the purchaser discuss with you the bids of competing firms (whether or not you disclose who the competition is) in order to get a lower bid price?

Always	Frequently	Sometimes	Rarely/Never
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- IV-4. **Services included in bid.**--Do the bids that you make for LPTs typically include other services such as installation, maintenance, warranties, etc.?

No	Yes	If yes, describe.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-5. **Discount policy.**-- Please describe your firm's discount policies.

--

- IV-6. **Pricing terms.**— On what basis are your firm's prices of domestic large power transformers usually quoted (*check one*)?

Delivered	F.o.b.	If f.o.b., specify point
<input type="checkbox"/>	<input type="checkbox"/>	

IV-7. **Multiple shipment contracts.--**

- (a) Please report the approximate share of the value of your firm's sales of its U.S.-produced large power transformers in 2023 by type of contract.

Type of sale	Share of value of 2023 sales
Single shipment contract	%
Blanket/alliance agreement (bidding)	%
Blanket/alliance agreement (private)	%
Multiple shipment individual contract (bidding)	%
Multiple shipment individual contract (private)	%
Total (should sum to 100.0%)	0.0 %

- (b) What is the average number of large power transformers in a multiple-shipment contract? _____ units
- (c) Absent a change in the specifications or terms of the original agreement (e.g., a change in warranty, purchaser's request for installation, etc.), can prices be renegotiated during the contract period?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

- (d) If yes, how often are prices renegotiated?

Always	Frequently	Sometimes	Rarely/Never
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IV-8. **Lead times.**--What is your firm's share of sales from inventory and produced to order and what is the typical lead time between a customer's order and the date of delivery for your firm's sales of its large power transformers for 2021, 2022, and 2023?

(a) Please report lead time information for 2021 below.

Source	Share of 2021 sales (percent)	Lead time (average number of days for 2021)
From inventory		
Produced to order		
Total (should sum to 100.0%)	0.0	

(b) Please report lead time information for 2022 below.

Source	Share of 2022 sales (percent)	Lead time (average number of days for 2022)
From inventory		
Produced to order		
Total (should sum to 100.0%)	0.0	

(c) Please report lead time information for 2023 below.

Source	Share of 2023 sales (percent)	Lead time (average number of days for 2023)
From inventory		
Produced to order		
Total (should sum to 100.0%)	0.0	

IV-9. **Shipping information.**--

- (a) What is the approximate percentage of the cost of U.S.-produced large power transformers that is accounted for by U.S. inland transportation costs? _____ %
- (b) Who generally arranges the transportation to your firm's customers' locations?
☐ Your firm ☐ Purchaser (*check one*)
- (c) Indicate the approximate percentage of your firm's sales of large power transformers that are delivered the following distances from your firm's production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
Total (should sum to 100.0%)	0.0 %

- IV-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced large power transformers since January 1, 2018 (check all that apply)?

Geographic area	✓ if applicable
Northeast. —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
Midwest. —IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
Southeast. —AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
Central Southwest. —AR, LA, OK, and TX.	<input type="checkbox"/>
Mountains. —AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
Pacific Coast. —CA, OR, and WA.	<input type="checkbox"/>
Other. —All other markets in the United States not previously listed, including AK, HI, PR, and VI.	<input type="checkbox"/>

IV-11. **End uses.**--Have there been any changes in the end uses of large power transformers since January 1, 2018 or do you anticipate any future changes?

Changes in end uses	No	Yes	Explain
From January 1, 2018-December 31, 2020	<input type="checkbox"/>	<input type="checkbox"/>	
Changes since January 1, 2021	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated future changes	<input type="checkbox"/>	<input type="checkbox"/>	

IV-12. **Substitutes.**--Have there been any changes in the number or types of products that can be substituted for large power transformers since January 1, 2018 or do you anticipate any future changes?

No	Yes	If yes, explain the changes, noting when these changes occurred or are expected to occur.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-13. **Availability of supply.**--Has the availability of large power transformers in the U.S. market changed since January 1, 2018? Do you anticipate any future changes?

Availability in the U.S. market	No	Yes	Please explain, noting the countries and reasons for the changes.
From January 1, 2018-December 31, 2020:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from South Korea	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
Changes since January 1, 2021:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from South Korea	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated future changes:			
U.S.-produced product	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from South Korea	<input type="checkbox"/>	<input type="checkbox"/>	
Imports from all other countries	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-14. **Demand trends.**-- Has demand within the United States and outside of the United States (if known) for large power transformers steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2018, and how do you anticipate demand will change in the future? Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Select one box per row.

Market	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explanation and factors
From January 1, 2018-December 31, 2020						
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Demand since January 1, 2021						
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated future demand						
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-15. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of large power transformers since January 1, 2018 or do you anticipate any future changes?

No	Yes	If yes, please describe, noting when these changes occurred or are expected to occur.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-16. **Business cycles.**--Is the large power transformers market subject to business cycles, either during the year or across years? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2018.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-17. **Conditions of competition.**--Is the large power transformers market subject to conditions of competition distinctive to large power transformers other than the business cycles described in the previous question? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2018.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-18. **Technology and growth effects**

- (a) **Impact of smart grid technology on firm.**--Have developments relating to smart grid technology had a discernible impact on your firm's importation and sales of large power transformers since January 1, 2018?

No	Yes	If yes, describe.
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) **Impact of increase in renewable energy on firm.**--Have developments relating to growth in renewable energy sources had a discernible impact on your firm's importation and sales of large power transformers since January 1, 2018?

No	Yes	If yes, describe.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-19. **Impact of Inflation Reduction Act of 2022.**—Has there been an impact on the market for large power transformer due to the government infrastructure spending and loans programs under the Inflation Reduction Act of 2022?

No	Yes	If yes, describe.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-20. **Supply constraints.**--Has your firm refused, declined, or been unable to supply large power transformers since January 1, 2018 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe—including any actions taken to address the customers' supply constraint(s).
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-21. **Raw materials.**-- Have large power transformers raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2018, and how do you expect they will change in the future?

Select one box per row.

Raw materials prices	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explain, noting how raw material price changes have affected your firm's selling prices for large power transformers.
From January 1, 2018-December 31, 2020	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Changes since January 1, 2021	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Anticipated future changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-22. **Price comparisons.**-- Are you aware of prices of large power transformers in non-U.S. markets? If yes, please compare market prices of large power transformers in U.S. and non-U.S. markets. Provide information as to time periods and regions for any price comparisons and note the sources for your market knowledge.

No	Yes	If yes, please describe.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-23. **Export constraints.**--Describe how easily your firm can shift its sales of large power transformers between the U.S. market and alternative export markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints that would prevent or retard your firm from shifting large power transformers between the U.S. and alternative export markets within a 12-month period.

--

- IV-24. **Barriers to trade.**--Are your firm's exports of large power transformers subject to any tariff or non-tariff barriers to trade in other countries?

No	Yes	If yes, please list the countries and describe any such barriers and any significant changes in such barriers that have occurred since January 1, 2018, or that are expected to occur in the future.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-25. **Interchangeability.**—How often is large power transformers produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

Please indicate A, F, S, N, or O in the table below:

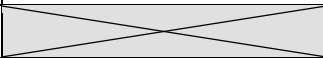
A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

O = *no familiarity* with products from a specified country-pair

Country-pair	South Korea	Other countries
United States		
South Korea		
For any country-pair producing large power transformers that is <i>sometimes</i> or <i>never</i> interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of large power transformers produced in the countries:		

IV-26. **Factors other than price.**—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between large power transformers produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or O in the table below:

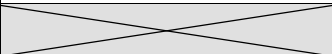
A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

O = *no familiarity* with products from a specified country-pair

Country-pair	South Korea	Other countries
United States		
South Korea		
<p>For any country-pair for which factors other than price are <i>always</i> or <i>frequently</i> a significant factor in your firm's sales of large power transformers, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:</p>		

IV-27. **Role of section 232 measures.**—Did the measures (e.g., tariffs, quotas, etc.) on imported steel/aluminum products under section 232, or changes in the measures (such as the level, coverage, or nature of the measures), have an impact on the large power transformers market in the United States, including any effects on large power transformers cost, price, supply, and/or demand, since January 1, 2018?

Yes— Please indicate the impact in the table below.	No— Skip to next question.	Don't know— Skip to next question.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Select one box per row.

Factor	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Explain, noting how the imposition of measures under section 232 affected each factor of the large power transformers market in the United States.
Supply of U.S.-produced large power transformers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supply of imported large power transformers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Prices for large power transformers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall U.S. demand for large power transformers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Raw material costs for large power transformers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-28. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at:

https://usitc.gov/reports/active_import_injury_questionnaires.

Please do not attempt to modify the format or permissions of the questionnaire document. Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

- **Upload via Secure Drop Box.**—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission’s secure upload facility:

Web address: <https://dropbox.usitc.gov/oinv/>

Pin: LPT

- **E-mail.**—E-mail the MS Word questionnaire to Stamen.Borisson@usitc.gov; include a scanned copy of the signed certification page (page 1). *Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure drop-box system and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm’s nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.*

If your firm does not produce this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

Parties to this proceeding.—If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission’s Secretary (202-205-1802). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.