

U.S. PRODUCERS' QUESTIONNAIRE

CRYSTALLINE SILICON PHOTOVOLTAIC CELLS, WHETHER OR NOT ASSEMBLED INTO MODULES, FROM CAMBODIA, MALAYSIA, THAILAND, AND VIETNAM

This questionnaire must be received by the Commission by **February 10, 2025**
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 countervailing and antidumping duty investigations concerning crystalline silicon photovoltaic cells, whether or not assembled into modules ("CSPV cells and modules"), from Cambodia, Malaysia, Thailand, and Vietnam (Inv. Nos. 701-TA-722-725 and 731-TA-1690-1693 (Final)). 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 CSPV cells and modules (as defined on next page) in the United States at any time since January 1, 2022?

☐ **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's secure portal by clicking on the following link:
<https://usitc.gov/qportal>. (PIN: **CSPV**). 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 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.--This proceeding was instituted in response to a petition filed on April 24, 2024, by the American Alliance for Solar Manufacturing Trade Committee. Countervailing and antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce (“Commerce”) makes an affirmative determination of subsidization and/or dumping. Pertinent information to this proceeding is available at:

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

Other case information: <https://ids.usitc.gov/case/8195/investigation/8589>.

CSPV cells and modules covered by this proceeding Commerce has defined the subject merchandise as crystalline silicon photovoltaic cells, and modules, laminates, and panels, consisting of crystalline silicon photovoltaic cells, whether or not partially or fully assembled into other products, including, but not limited to, modules, laminates, panels and building integrated materials.

These investigations cover crystalline silicon photovoltaic cells of thickness equal to or greater than 20 micrometers, having a p/n junction formed by any means, whether or not the cell has undergone other processing, including, but not limited to, cleaning, etching, coating, and/or addition of materials (including, but not limited to, metallization and conductor patterns) to collect and forward the electricity that is generated by the cell.

Merchandise under consideration may be described at the time of importation as parts for final finished products that are assembled after importation, including, but not limited to, modules, laminates, panels, building integrated modules, building-integrated panels, or other finished goods kits. Such parts that otherwise meet the definition of merchandise under consideration are included in the scope of the investigations.

Excluded from the scope of the investigations are thin film photovoltaic products produced from amorphous silicon (a-Si), cadmium telluride (CdTe), or copper indium gallium selenide (CIGS). Also excluded from the scope of the investigations are crystalline silicon photovoltaic cells, not exceeding 10,000 mm² in surface area, that are permanently integrated into a consumer good whose function is other than power generation and that consumes the electricity generated by the integrated crystalline silicon photovoltaic cell. Where more than one cell is permanently integrated into a consumer good, the surface area for purposes of this exclusion shall be the total combined surface area of all cells that are integrated into the consumer good.

Additionally, excluded from the scope of the investigations are panels with surface area from 3,450 mm² to 33,782 mm² with one black wire and one red wire (each of type 22 AWG or 24 AWG not more than 206 mm in length when measured from panel extrusion), and not exceeding 2.9 volts, 1.1 amps, and 3.19 watts. For the purposes of this exclusion, no panel shall contain an internal battery or external computer peripheral ports.

Also excluded from the scope of the investigations are:

1. Off grid CSPV panels in rigid form with a glass cover, with the following characteristics: (A) a total power output of 100 watts or less per panel; (B) a maximum surface area of 8,000 cm² per panel; (C) do not include a built-in inverter; (D) must include a permanently connected wire that terminates in either an 8 mm male barrel connector, or a two-port rectangular connector with two pins in square housings of different colors; (E) must include visible parallel grid collector metallic wire lines every 1–4 millimeters

across each solar cell; and (F) must be in individual retail packaging (for purposes of this provision, retail packaging typically includes graphics, the product name, its description and/or features, and foam for transport); and

2. Off grid CSPV panels without a glass cover, with the following characteristics: (A) a total power output of 100 watts or less per panel; (B) a maximum surface area of 8,000 cm² per panel; (C) do not include a built-in inverter; (D) must include visible parallel grid collector metallic wire lines every 1–4 millimeters across each solar cell; and (E) each panel is (1) permanently integrated into a consumer good; (2) encased in a laminated material without stitching, or (3) has all of the following characteristics: (i) the panel is encased in sewn fabric with visible stitching, (ii) includes a mesh zippered storage pocket, and (iii) includes a permanently attached wire that terminates in a female USB–A connector.

In addition, the following CSPV panels are excluded from the scope of the investigations: off-grid CSPV panels in rigid form with a glass cover, with each of the following physical characteristics, whether or not assembled into a fully completed off-grid hydropanel whose function is conversion of water vapor into liquid water: (A) a total power output of no more than 80 watts per panel; (B) a surface area of less than 5,000 square centimeters (cm²) per panel; (C) do not include a built-in inverter; (D) do not have a frame around the edges of the panel; (E) include a clear glass back panel; and (F) must include a permanently connected wire that terminates in a two port rectangular connector.

Additionally excluded from the scope of these investigations are off-grid small portable crystalline silicon photovoltaic panels, with or without a glass cover, with the following characteristics: (1) a total power output of 200 watts or less per panel; (2) a maximum surface area of 16,000 cm² per panel; (3) no built-in inverter; (4) an integrated handle or a handle attached to the package for ease of carry; (5) one or more integrated kickstands for easy installation or angle adjustment; and (6) a wire of not less than 3 meters either permanently connected or attached to the package that terminates in an 8 mm diameter male barrel connector.

Also excluded from the scope of these investigations are off-grid crystalline silicon photovoltaic panels in rigid form with a glass cover, with each of the following physical characteristics, whether or not assembled into a fully completed off-grid hydropanel whose function is conversion of water vapor into liquid water: (A) a total power output of no more than 180 watts per panel at 155 degrees Celsius; (B) a surface area of less than 16,000 square centimeters (cm²) per panel; (C) include a keep-out area of approximately 1,200 cm² around the edges of the panel that does not contain solar cells; (D) do not include a built-in inverter; (E) do not have a frame around the edges of the panel; (F) include a clear glass back panel; (G) must include a permanently connected wire that terminates in a two-port rounded rectangular, sealed connector; (H) include a thermistor installed into the permanently connected wire before the twoport connector; and (I) include exposed positive and negative terminals at opposite ends of the panel, not enclosed in a junction box.

Further excluded from the scope of the investigations are:

1. Off grid rigid CSPV panels with a glass cover, with the following characteristics: (A) a total power output of 200 watts or less per panel, (B) a maximum surface area of 10,500 cm² per panel, (C) do not include a built-in inverter, (D) must include a permanently connected wire that terminates in waterproof connector with a cylindrical positive electrode and a rectangular negative electrode with the positive and negative electrodes having an interlocking structure, (E) must include visible parallel grid collector metallic wire lines every 1–4 millimeters across each solar cell, and (F) must be in individual retail packaging (for purposes of this provision, retail packaging typically includes graphics, the product name, its description and/or features); and

2. Off-grid small portable crystalline silicon photovoltaic panels, with or without a glass cover, with the following characteristics: (A) a total power output of 200 watts or less per panel, (B) a maximum surface area of 16,000 cm² per panel, (C) no built-in inverter, (D) an integrated handle or a handle attached to the package for ease of carry, (E) one or more integrated kickstands for easy installation or angle adjustment, and (F) a wire either permanently connected or attached to the package terminates in waterproof connector with a cylindrical positive electrode and a rectangular negative electrode with the positive and negative electrodes having an interlocking structure.

Also excluded from the scope of the investigations are:

1. Off grid rigid CSPV panels with a glass cover, with the following characteristics: (A) a total power output of 200 watts or less per panel, (B) a maximum surface area of 10,500 cm² per panel, (C) do not include a built-in inverter, (D) must include a permanently connected wire that terminates in waterproof connector with a cylindrical positive electrode and a rectangular negative electrode with the positive and negative electrodes having an interlocking structure, (E) must include visible parallel grid collector metallic wire lines every 1–4 millimeters across each solar cell, and (F) must be in individual retail packaging (for purposes of this provision, retail packaging typically includes graphics, the product name, its description and/or features); and

2. Small off-grid panels with glass cover, with the following characteristics: (A) surface area from 3,450 mm² to 33,782 mm², (B) with one black wire and one red wire (each of type 22AWG or 28 AWG not more than 350 mm in length when measured from panel extrusion), (C) not exceeding 10 volts, (D) not exceeding 1.1 amps, (E) not exceeding 6 watts, and (F) for the purposes of this exclusion, no panel shall contain an internal battery or external computer peripheral ports.

Additionally excluded from the scope of the investigations are:

1. Off grid rigid CSPV panels with a glass cover, with the following characteristics: (A) a total power output of 175 watts or less per panel, (B) a maximum surface area of 9,000 cm² per panel, (C) do not include a built-in inverter, (D) must include a permanently connected wire that terminates in waterproof connector with a cylindrical positive electrode and a rectangular negative electrode with the positive and negative electrodes having an interlocking structure; (E) must include visible parallel grid collector metallic wire lines every 1–4 millimeters across each solar cell, and (F) must be in individual retail packaging (for purposes of this provision, retail packaging typically includes graphics, the product name, its description and/or features); and

2. Off grid CSPV panels without a glass cover, with the following characteristics, (A) a total power output of 220 watts or less per panel, (B) a maximum surface area of 16,000 cm² per panel, (C) do not include a built-in inverter, (D) must include visible parallel grid collector metallic wire lines every 1–4 millimeters across each solar cell, and (E) each panel is encased in a laminated material without stitching.

Also excluded from the scope of these investigations are off-grid CSPV panels in rigid form, with or without a glass cover, permanently attached to an aluminum extrusion that is an integral component of an automation device that controls natural light, whether or not assembled into a fully completed automation device that controls natural light, with the following characteristics:

1. a total power output of 20 watts or less per panel;
2. a maximum surface area of 1,000 cm² per panel;

3. does not include a built-in inverter for powering third party devices.

Modules, laminates, and panels produced in a third-country from cells produced in a subject country are covered by the investigations; however, modules, laminates, and panels produced in a subject country from cells produced in a third-country are not covered by the investigations.

Also excluded from the scope of these investigations are all products covered by the scope of the antidumping and countervailing duty orders on Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value, and Antidumping Duty Order, 77 FR 73018 (December 7, 2012); and Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China: Countervailing Duty Order, 77 FR 73017 (December 7, 2012).

Merchandise covered by the investigations is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under subheadings 8541.42.0010 and 8541.43.0010. Imports of the subject merchandise may enter under HTSUS subheadings 8501.71.0000, 8501.72.1000, 8501.72.2000, 8501.72.3000, 8501.72.9000, 8501.80.1000, 8501.80.2000, 8501.80.3000, 8501.80.9000, 8507.20.8010, 8507.20.8031, 8507.20.8041, 8507.20.8061, and 8507.20.8091. These HTSUS subheadings are provided for convenience and customs purposes; the written description of the scope of the investigations is dispositive.

CSPV cell.--A crystalline silicon photovoltaic ("CSPV") cell converts sunlight to electricity and is the basic element of a module. The investigation covers CSPV cells of a thickness equal to or greater than 20 micrometers, having a p/n junction (or variant thereof) formed by any means, whether or not the cell has undergone other processing, including, but not limited to, cleaning, etching, coating, and/or addition of materials (including, but not limited to, metallization and conductor patterns) to collect and forward the electricity that is generated by the cell. Included are photovoltaic cells that contain crystalline silicon in addition to other photovoltaic materials. This includes, but is not limited to, passivated emitter rear contact ("PERC") cells, heterojunction with intrinsic thin-layer ("HIT") cells, and other so-called "hybrid" cells.

CSPV module.--A joined group of CSPV cells, regardless of the number of cells or the shape of the joined group, that are capable of generating electricity. The term "**module**" is frequently used interchangeably with the term "**panel**." A "**lamine**ate" is a module that does not have a frame.

Building integrated materials.--Materials integrated into the building envelope, such as the façade or roof, containing CSPV cells. These building integrated materials replace conventional construction materials, such as glass or roof shingles, taking over the function that conventional materials would otherwise perform while also producing electricity.

Reporting of information.--If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

How to report data.--Generally, in this questionnaire you are to report only merchandise that matches the product definition for CSPV cells and modules (defined above) and exclude wholesale any merchandise listed within that definition as being "excluded" (e.g., thin film products, the specified off-grids products, et cetera). The exception to this would be merchandise that otherwise matches the definition of a CSPV cell and/or module (i.e., is not subject to an express product-based exclusion) but is being excluded by virtue of being covered under one the existing antidumping or countervailing duty orders against China. Data on these imports should be included in the reporting but classified as

“nonsubject” for these investigations. This would include any merchandise affirmatively found by the U.S. Department of Commerce to have been circumventing the antidumping or countervailing duty orders against China.

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 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-1a. **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-1b. **TAA information release.**--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, contact person's title, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

☐ Yes

☐ No

- 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 CSPV cells and modules, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities. Please describe the specific activities undertaken at each facility.

| Establishments covered ¹ | City, State | Zip (5 digit) | Description |
|---|-------------|---------------|-------------|
| 1 | | | |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| 9 | | | |
| 10 | | | |
| 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. **Petitioner status.**--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

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

I-4. **Petition support.**--Does your firm support or oppose the petition?

| Country | Investigation type | Support | Oppose | Take no position |
|----------|---------------------|--------------------------|--------------------------|--------------------------|
| Cambodia | Antidumping duty | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Cambodia | Countervailing duty | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Malaysia | Antidumping duty | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Malaysia | Countervailing duty | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Thailand | Antidumping duty | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Thailand | Countervailing duty | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Vietnam | Antidumping duty | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Vietnam | Countervailing duty | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

I-5. **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-6. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing CSPV cells and modules from Cambodia, Malaysia, Thailand, and Vietnam into the United States or that are engaged in exporting CSPV cells and modules from Cambodia, Malaysia, Thailand, and Vietnam to the United States?

☐ No ☐ Yes--List the following information.

| Firm name | Country | Affiliation |
|-----------|---------|-------------|
| | | |
| | | |
| | | |

I-7. **Related producers**.--Does your firm have any related firms, either domestic or foreign, that are engaged in the production of CSPV cells and modules?

☐ 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 **Julie Duffy** (202-708-2579, Julie.duffy@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 CSPV cells and modules since January 1, 2022. If any of your responses differ between cells and modules, please indicate such differences in the below narrative.

| <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.**—Since January 1, 2022, 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 CSPV cells and modules? 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 CSPV cells and modules. |
| <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 (as noted above) relating to the production of CSPV cells and modules 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 changes. |
| CSPV cells | | |
| <input type="checkbox"/> | <input type="checkbox"/> | |
| CSPV modules | | |
| <input type="checkbox"/> | <input type="checkbox"/> | |

- II-3a. **Production using same machinery.**--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce CSPV cells and modules, 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 CSPV cells and modules capacity" – The level of production of CSPV cells and modules 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 CSPV cells and modules based on the actual product mix experienced over the period.

"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.

| Takes into account | Installed overall capacity | Practical overall capacity | Practical CSPV cells and modules 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 CSPV cells and modules | No | No | Yes |

II-3a. Production using same machinery.—Continued**CSPV cells**

| Item | Quantity (in kilowatts) | | |
|--|-------------------------|------|------|
| | Calendar year | | |
| | 2022 | 2023 | 2024 |
| Capacity measures: | | | |
| Installed overall capacity ¹ | | | |
| Practical overall capacity ^{1 2} | | | |
| Practical CSPV cells capacity ^{3 4} | 0 | 0 | 0 |
| Production of: | | | |
| CSPV cells ^{3 4} | 0 | 0 | 0 |
| Other products ^{5 6} | | | |
| Total production using same machinery or workers | 0 | 0 | 0 |
| <p>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.</p> <p>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" and "practical" overall production capacities.</p> <p>³ Data entered in question II-8 for this indicator will populate here.</p> <p>⁴ Data reported for practical CSPV cells capacity should be greater than the data reported for production of CSPV cells 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 CSPV cells then "practical overall" and "practical CSPV cells" capacity measures should be equal to each other.</p> <p>⁵ Please identify these products: _____.</p> <p>⁶ Please note if there are any trial runs, samples, or any other production of cells by your firm (including that captively consumed) : _____.</p> | | | |

II-3b. Production using same machinery.—Continued**CSPV modules**

| Item | Quantity (in kilowatts) | | |
|--|-------------------------|------|------|
| | Calendar year | | |
| | 2022 | 2023 | 2024 |
| Capacity measures: | | | |
| Installed overall capacity ¹ | | | |
| Practical overall capacity ^{1 2} | | | |
| Practical CSPV modules capacity ^{3 4} | 0 | 0 | 0 |
| Production of: | | | |
| CSPV modules 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" and "practical" overall production capacities. ³ Data entered in question II-11 for this indicator will populate here. ⁴ Data reported for practical CSPV modules capacity should be greater than the data reported for production of CSPV modules 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 modules then "practical overall" and "practical CSPV modules" capacity measures should be equal to each other. ⁵ Please identify these products: _____. | | | |

II-3c. Operating parameters.--The **practical** overall capacity reported in II-3a is based on the following operating parameters:

| Hours per week | Weeks per year |
|----------------|----------------|
| | |

II-3d. Capacity calculations.--Please describe the methodology used to calculate **installed** and **practical** overall production capacities reported in II-3a, and explain any changes in reported capacities.

| |
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- II-3e. **Practical overall capacity constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's practical overall capacity over the period reported in questions II-3a and II-3d (as applicable). 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-3f. **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-3a.

- II-3g. **Excess installed overall capacity.**--To the extent that your company is reporting excess installed overall 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 CSPV cells and modules.

- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between CSPV cells and modules 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, etc.), and the degree to which these factors enhance or constrain such shifts.

- II-5. **Capacity checklist.**--Please check that the capacity numbers reported in question II-3a 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 CSPV cells and modules 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 CSPV cells and modules capacity measures based on <u>the actual availability of material inputs</u> ? | <input type="checkbox"/> |
| Do both practical overall capacity and practical CSPV cells and modules 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 CSPV cells and modules 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-6. **Tolling.**--Since January 1, 2022, has your firm been involved in a toll agreement regarding the production of CSPV cells and modules?

"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 | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | If yes—Please complete the table below. |

| | | |
|--|----------------------------------|----------------------------------|
| 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 CSPV cells and modules that was included in this toll arrangement in 2024. | % | |
| Please describe the activities performed in this tolling arrangement: | | |
| Please indicate the name(s) of the firm(s) involved: | | |

II-7. Foreign trade zones.--

- (a) **Firm's FTZ operations.**--Does your firm produce CSPV cells and modules in and/or admit CSPV cells and modules 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 firm's 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 CSPV cells and modules into a foreign trade zone (FTZ) for use in distribution of CSPV cells and modules and/or the production of downstream articles?

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

- II-8. **Production, shipments, and inventory data.**--Report your firm's practical capacity, production, shipments, and inventories of domestically produced CSPV cells during the specified periods.

"Assemblers of CSPV modules" -- Those U.S. firms that purchase or import CSPV cells and assemble CSPV modules in the United States.

"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-8. **Production, shipment, and inventory data: CSPV cells.—Continued****CSPV cells**

| Quantity (in kilowatts) and value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2022 | 2023 | 2024 |
| Practical CSPV cells 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 ² (G) | | | |
| Transfers to related firms:² | | | |
| Quantity (H) | | | |
| Value ² (I) | | | |
| Export shipments:³ | | | |
| Quantity (J) | | | |
| Value (K) | | | |
| End-of-period inventories (quantity) (L) | | | |
| ¹ Report your firm's practical CSPV cells and modules capacity consistent with the definitions and instructions included in question II-3a. 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: _____. | | | |

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.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2022 | 2023 | 2024 |
| 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-9. **Channels of distribution: CSPV cells.**--Report your firm's U.S. shipments of U.S. produced CSPV cells (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution during the specified periods.

CSPV cells

| Quantity (in kilowatts) and value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2022 | 2023 | 2024 |
| U.S. shipments: | | | |
| to Distributors -- Quantity (M) | | | |
| Value (N) | | | |
| to Module assemblers -- Quantity (O) | | | |
| Value (P) | | | |
| to Residential installers -- Quantity (Q) | | | |
| Value (R) | | | |
| to Commercial installers -- Quantity (S) | | | |
| Value (T) | | | |
| to Utilities/developers -- Quantity (U) | | | |
| Value (V) | | | |

RECONCILIATION OF CHANNELS.--Please ensure that the quantities and values reported for channels of distribution (i.e., lines M through V) in each time period equal the quantity and value reported for U.S. shipments (i.e., line D through I) 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 | Calendar year | | |
|--|---------------|------|------|
| | 2022 | 2023 | 2024 |
| Quantity: $M + O + Q + S + U - D - F - H$ = zero ("0"), if not revise. | 0 | 0 | 0 |
| Value: $N + P + R + T + V - D - F - H$ = zero ("0"), if not revise. | 0 | 0 | 0 |

- II-10. **U.S. shipments by cell type: CSPV cells.**--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 CSPV cells by type during 2024.

CSPV cells

| Quantity (in kilowatts) | |
|--------------------------------------|--------------------|
| Item | Calendar year 2024 |
| U.S. shipments of CSPV cells: | |
| Bifacial (W) | |
| Non bifacial (X) | |

RECONCILIATION OF U.S. SHIPMENTS.--Please ensure that the quantities reported for U.S. shipments by type (i.e., lines W and X) in 2024 equal the quantity reported for U.S. shipments (i.e., line D, F, H) in 2024 in question II-8. 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 2024 |
|--|--------------------|
| $W + X - D - F - H = \text{zero ("0")}$, if not revise. | 0 |

- II-11. **Production, shipments, and inventory data: CSPV modules.**--Report your firm's practical capacity, production, shipments, and inventories of domestically produced CSPV modules during the specified periods.

CSPV modules

| Quantity (in kilowatts) and value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2022 | 2023 | 2024 |
| Practical CSPV modules capacity¹ (quantity) (Y) | | | |
| Beginning-of-period inventories (quantity) (Z) | | | |
| Production (quantity) (AA) | | | |
| U.S. shipments: | | | |
| Commercial shipments: | | | |
| Quantity (AB) | | | |
| Value (AC) | | | |
| Internal consumption:² | | | |
| Quantity (AD) | | | |
| Value ² (AE) | | | |
| Transfers to related firms:² | | | |
| Quantity (AF) | | | |
| Value ² (AG) | | | |
| Export shipments:³ | | | |
| Quantity (AH) | | | |
| Value (AI) | | | |
| End-of-period inventories (quantity) (AJ) | | | |
| ¹ Report your firm's practical CSPV modules capacity consistent with the definitions and instructions included in question II-3a. 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: _____. | | | |

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line AJ) should be equal to the beginning-of-period inventories (i.e., line Z), plus production (i.e., line AA), less total shipments (i.e., lines AB, AD, AF, AH). 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.

| Reconciliation | Calendar year | | |
|---|---------------|------|------|
| | 2022 | 2023 | 2024 |
| Z + AA – AB – AD – AF – AH – AJ = 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-12. **Channels of distribution: CSPV modules.**--Report your firm's U.S. shipments of U.S. produced CSPV modules (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) by channel of distribution during the specified periods.

CSPV modules

| Quantity (in kilowatts) and value (in \$1,000) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2022 | 2023 | 2024 |
| U.S. shipments: | | | |
| to Distributors -- Quantity (AK) | | | |
| Value (AL) | | | |
| to Module assemblers -- Quantity (AM) | | | |
| Value (AN) | | | |
| to Residential installers -- Quantity (AO) | | | |
| Value (AP) | | | |
| to Commercial installers -- Quantity (AQ) | | | |
| Value (AR) | | | |
| to Utilities/developers -- Quantity (AS) | | | |
| Value (AT) | | | |

RECONCILIATION OF CHANNELS.--Please ensure that the quantities reported for channels of distribution (i.e., lines AK through AT) in each time period equal the quantity reported for U.S. shipments (i.e., lines AB through AG) 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 | Calendar year | | |
|---|---------------|------|------|
| | 2022 | 2023 | 2024 |
| Quantity: AK + AM + AO + AQ + AS – AB – AD – AF = zero ("0"), if not revise. | 0 | 0 | 0 |
| Value: AL + AN + AP + AR + AT – AC – AE – AG = zero ("0"), if not revise. | 0 | 0 | 0 |

- II-13. **U.S. shipments by type: CSPV modules.**--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 CSPV modules by type during 2024.

CSPV modules

| Quantity (in kilowatts) | |
|--|--------------------|
| Item | Calendar year 2024 |
| U.S. shipments of CSPV modules: | |
| Non-bifacial modules – using bifacial cells (AU) | |
| Non-bifacial modules – using non-bifacial cells (AV) | |
| Bifacial modules – using bifacial cells (AW) | |

***RECONCILIATION OF U.S. SHIPMENTS.**--Please ensure that the quantities reported for U.S. shipments by type (i.e., lines AU through AW) in 2024 equal the quantity reported for U.S. shipments (i.e., lines AB, AD, and AF) in 2024 in question II-11. 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 2024 |
|--|--------------------|
| AU + AV + AW – AB – AD – AF = zero ("0"), if not revise. | 0 |

- II-14. **Employment data.**--Report your firm's employment-related data related to the production of CSPV cells and modules 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.

"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.

CSPV cells

| Item | Calendar year | | |
|---|---------------|------|------|
| | 2022 | 2023 | 2024 |
| Average number of PRWs (<i>number</i>) | | | |
| Hours worked by PRWs (<i>1,000 hours</i>) | | | |
| Wages paid to PRWs (<i>\$1,000</i>) | | | |

CSPV modules

| Item | Calendar year | | |
|---|---------------|------|------|
| | 2022 | 2023 | 2024 |
| 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-15. **Transfers to related firms.**--If your firm reported transfers to related firms in question II-8, 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.

| |
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II-16. **Purchases (CSPV cells).**--Has your firm purchased CSPV cells produced in the United States or in other countries since January 1, 2022? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

For products such as laminates, panels, and modules that are partially or fully assembled from CSPV cells, the location where the CSPV cells were manufactured determines the country of origin.

"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

CSPV Cells

| (Quantity in kilowatts) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2022 | 2023 | 2024 |
| Purchases from U.S. importers of CSPV cells from— | | | |
| Cambodia | | | |
| Malaysia | | | |
| Thailand | | | |
| Vietnam | | | |
| Subject sources | 0 | 0 | 0 |
| All other sources ¹ | | | |
| Purchases from domestic producers² | | | |
| Purchases from other sources³ | | | |
| Purchases from all sources | 0 | 0 | 0 |
| ¹ Please list 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-17. **Purchases of imports from subject sources (CSPV cells).**--If your firm reported purchases from U.S. importers of CSPV cells from Cambodia, Malaysia, Thailand, and Vietnam at any time since January 1, 2022, report those purchases by the individual importer of record and subject source.

Purchases of subject imports (CSPV cells)

| Quantity (in kilowatts) | | | | |
|-------------------------|----------------|---------------|------|------|
| Importer of record | Subject source | Calendar year | | |
| | | 2022 | 2023 | 2024 |
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| 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 | | |
|--|---------------|------|------|
| | 2022 | 2023 | 2024 |
| Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise. | 0 | 0 | 0 |

- II-18. **Purchases (CSPV modules).**--Has your firm purchased modules produced in the United States or in other countries since January 1, 2022? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

For products such as laminates, panels, and modules that are partially or fully assembled from CSPV cells, the location where the CSPV cells were manufactured determines the country of origin.

"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

CSPV modules

| (Quantity in kilowatts) | | | |
|--|---------------|------|------|
| Item | Calendar year | | |
| | 2022 | 2023 | 2024 |
| Purchases from U.S. importers of CSPV modules from— | | | |
| Cambodia | | | |
| Malaysia | | | |
| Thailand | | | |
| Vietnam | | | |
| Subject sources | 0 | 0 | 0 |
| All other sources ¹ | | | |
| Purchases from domestic producers² | | | |
| Purchases from other sources³ | | | |
| Purchases from all sources | 0 | 0 | 0 |
| ¹ Please list 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-19. **Purchases of imports from subject sources (CSPV modules).**--If your firm reported purchases from U.S. importers of CSPV modules from Cambodia, Malaysia, Thailand, and Vietnam at any time since January 1, 2022, report those purchases by the individual importer of record and subject source.

Purchases of subject imports (CSPV modules)

| Quantity (in kilowatts) | | | | |
|-------------------------|----------------|---------------|------|------|
| Importer of record | Subject source | Calendar year | | |
| | | 2022 | 2023 | 2024 |
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| 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 | | |
|--|---------------|------|------|
| | 2022 | 2023 | 2024 |
| Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise. | 0 | 0 | 0 |

II-20. **Imports**--Since January 1, 2022, has your firm imported CSPV cells and modules?

"Importer" – The person or firm primarily liable for the payment of any duties on the merchandise, or an authorized agent acting on his behalf.

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

II-21. **Other explanations**--If your firm would like to further explain 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.

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PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to Joanna Lo (202-205-1888, joanna.lo@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, 2022, 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-10a, 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 CSPV cells and modules:

- B.2. Does your firm prepare profit/loss statements for CSPV cells and modules:

☐ 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"/> | | | | |

III-2. **Accounting system.**—*Continued.*

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"/> |

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

| |
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| |
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III-4. **Product listing.**—Please list the products your firm produces in the facilities in which it produces CSPV cells and modules and provide the share of net sales accounted for by these products in 2023.

| Products | Share of sales in 2024 |
|--|------------------------|
| CSPV cells (do not include internal consumption) | % |
| CSPV modules | % |
| | % |
| | % |
| | % |

III-5. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of CSPV cells and/or modules 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-8a.

- III-6. **Inputs from related suppliers details.**—Please identify the inputs used in the production of CSPV cells (III-9a) and/or modules (III-10a) that your firm purchases from related suppliers and that are reflected in questions III-9a and/or III-10a. For “Share of total COGS” please report this information by relevant input for 2023.

| Input | Related supplier | Share of total COGS in 2023 |
|---|------------------|-----------------------------|
| Operations on CSPV cells (commercial sales and transfers): | | |
| | | % |
| | | % |
| | | % |
| Operations on CSPV modules: | | |
| | | % |
| | | % |
| | | % |

- 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 |
|---|--------------------------|
| Operations on CSPV cells (commercial sales and transfers): | |
| 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: | |
| Operations on CSPV modules: | |
| 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. **Valuation method used for inputs from related suppliers.**—Please confirm that the inputs purchased from related suppliers, as identified in III-6, were reported in III-9a (cells) and/or III-10a (modules) in a manner consistent with the firm's accounting books and records.

| Operations on CSPV cells, commercial sales and transfers (III-9a): | | |
|--|--------------------------|---|
| 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"/> | |
| Operations on CSPV modules (III-10a): | | |
| Yes | No | If no—Provide an explanation and the valuation basis used for these inputs in question III-10a. |
| <input type="checkbox"/> | <input type="checkbox"/> | |

- III-8a. **CELLS (III-9a): Cost assignment/allocation basis.**—Briefly describe the assignment/allocation bases used by your firm to assign the costs and expenses listed below for CSPV cells 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 CELLS— | |
|-----------------------|---|------------------------------------|
| | 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-8b. **MODULES (III-10a): Cost assignment/allocation basis.**—Briefly describe the assignment/allocation bases used by your firm to assign the costs and expenses listed below for modules in the normal course of business and in the financial results reported in question III-10a (e.g., actual costs, standard costs, percentage of COGS, percentage of sales, etc.).

| Cost/expense | Assignment/allocation bases used for MODULES— | |
|-----------------------|---|-------------------------------------|
| | In the normal course of business | In the financial results at III-10a |
| Raw materials | | |
| Direct labor | | |
| Other factory costs | | |
| SG&A expenses | | |
| Interest expense | | |
| Other income/expenses | | |

- III-8c. **Allocation methodology (both cell and/or module operations).**—Briefly describe the methodology used to allocate revenues and costs related to the operations of cells and/or modules reported in the question III-9a (CSPV cells) and/or question III-10a (CSPV modules).

CELLS: Nonrecurring items:

MODULES: Nonrecurring items:

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 in questions III-9a and/or III-10a. 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 CSPV cells and/or modules as well as specific statements and worksheets) used to compile these data.

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

Net sales—Report all commercial sales and transfers to related firms (do not report internal consumption), 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 (see question III-14 for a reconciliation grid).

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.

Table III-9a below, while specific to CSPV cells sold commercially and/or transferred, should be completed by integrated producers of CSPV modules.

III-9a. Operations on CSPV cells and modules.—Continued

Note: CSPV cells manufactured and/or purchased by your firm which were used internally to produce CSPV modules, if any, should be reported as a component of raw material costs in III-9a (operations on CSPV modules).

CELLS (commercial sales and transfers only)

| Quantity (in kilowatts) and value (in \$1,000) | | | |
|---|-------|------|------|
| Item | Years | | |
| | 2022 | 2023 | 2024 |
| Net sales quantities: | | | |
| Commercial sales | | | |
| Transfers to related firms | | | |
| Total net sales quantities | 0 | 0 | 0 |
| Net sales values: | | | |
| Commercial sales | | | |
| Transfers to related firms | | | |
| Total net sales values | 0 | 0 | 0 |
| Cost of goods sold (COGS): | | | |
| Polysilicon, Ingots | | | |
| Wafers | | | |
| Other raw material costs (CSPV cells) | | | |
| Total raw materials | 0 | 0 | 0 |
| Direct labor (CSPV cells) | | | |
| Other factory costs (CSPV cells) | | | |
| 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 | | | |
| 45X MPTC/IRA income | | | |
| All other income items | | | |
| Net income or (loss) before income taxes | 0 | 0 | 0 |

III-9b. **CELLS: Explanation of trends.**—Indicate the primary decisions, events, or factors that impacted the trends in the following metrics as reported in question III-9a. Include information that may have impacted per unit sales and costs (e.g., product mix variations, patented product, etc.).

| Metric in III-9a | Explanation of trends from 2022 to 2024 |
|--|---|
| Commercial sales quantity and value (and fluctuations in sales unit values) | |
| Transfers quantity and value (and fluctuations in transfers unit values) | |
| Raw material costs | |
| Direct labor costs | |
| Energy and utilities (include where these costs are reported in III-9a) | |
| Other factory costs | |
| SG&A costs | |
| Other expenses/income and interest expenses | |
| 45X MPTC/IRA income | |
| Other government incentives (list the specific programs) | |
| Other expenses/income and interest expenses (not related to government incentives) | |

- III-9c. **CELLS: Variable costs and total manufacturing fixed costs.**—Estimate the share of variable costs included in each item reported in question III-9a on CSPV cells operations and report the total fixed manufacturing costs in 2024.

| Item | Share of 2024: COGS (percent) | | Share of 2024: SG&A (percent) | |
|------------------------------|-------------------------------------|---|-------------------------------------|---|
| Share of costs that are: | | | | |
| Variable | | % | | % |
| Fixed | | % | | % |
| Total (should sum to 100.0%) | 0.0 | % | 0.0 | % |

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

| Item | Years | | |
|---|-------|------|------|
| | 2022 | 2023 | 2024 |
| CELLS: Depreciation expense (in \$1,000) | | | |

- III-9e. **CELLS: 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-9f. **CELLS: 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-9g. **CELLS: Financial data checklist.**—

| Confirm the following regarding your financial data in question III-9a: | ✓ if Yes |
|--|--------------------------|
| Commercial sales values in III-9a are net of (i.e., less) any discounts, returns, or allowances to customers? | <input type="checkbox"/> |
| Commercial sales values in III-9a exclude prepaid freight costs or other freight costs to customers from your U.S. point of shipment? | <input type="checkbox"/> |
| Transfers are reported at fair market value? | <input type="checkbox"/> |
| Internal consumption are excluded ? | <input type="checkbox"/> |
| All COGS items exclude finished goods freight to customers? | <input type="checkbox"/> |
| If you did not ✓ Yes in any of the boxes above, go back to the relevant question(s) in III-9a and revise your response or provide an explanation: | |

III-10a. **Operations on CSPV modules.**—Report the revenue and related cost information requested below on the CSPV modules operation of your firm's U.S. establishment(s). Include only sales (whether domestic or exports) and costs related to your U.S. manufacturing operations for CSPV modules. 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 (see question III-14 for a reconciliation grid).

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.

Table III-10a below should be completed by integrated producers of CSPV modules and assemblers of CSPV modules.

III-10a. Operations on CSPV modules.--

CSPV MODULES

| Quantity (in kilowatts) and value (in \$1,000) | | | |
|---|-------|------|------|
| Item | Years | | |
| | 2022 | 2023 | 2024 |
| 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): | | | |
| Total raw materials (from III-10c) | 0 | 0 | 0 |
| Direct labor (modules only) | | | |
| Other factory costs (modules only) | | | |
| 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 | | | |
| 45X MPTC/IRA income | | | |
| All other income items | | | |
| Net income or (loss) before income taxes | 0 | 0 | 0 |

III-10b. **MODULES: Net sales by source of cells.**—Report the quantity and value of net sales of CSPV modules produced in the United States based on the source of the purchased and/or imported CSPV cells used in their production during the specified periods.

| Quantity (<i>in kilowatts</i>) and value (in \$1,000) | | | |
|---|-------|------|------|
| Item | Years | | |
| | 2022 | 2023 | 2024 |
| Net sales of CSPV modules made using: | | | |
| Domestic-origin CSPV cells | | | |
| Quantity | | | |
| Value | | | |
| Subject foreign-origin CSPV cells | | | |
| Quantity | | | |
| Value | | | |
| Nonsubject foreign-origin CSPV cells | | | |
| Quantity | | | |
| Value | | | |

RECONCILIATION OF NET SALES.--Please ensure that the quantities and value for net sales reported based on the origin of the CSPV cells used to produce them (i.e., question III-10b) equal the quantities and values for net sales reported based the type of transaction (i.e., question III-10a) 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 | Calendar year | | |
|---|---------------|------|------|
| | 2022 | 2023 | 2024 |
| Quantity reconciliation: Net sales quantity by type input in this question (i.e., III-10b) minus net sales quantity by type of sale in the previous question (i.e., III-10a) should equal = zero ("0"), if not revise. | 0 | 0 | 0 |
| Value reconciliation: Net sales value by type input in this question (i.e., III-10b) minus net sales value by type of sale in the previous question (i.e., III-10a) should equal = zero ("0"), if not revise. | 0 | 0 | 0 |

III-10c. **MODULES: Raw materials by type of input.**—Provide a breakout of the relevant components of total raw material costs that will be populated in the “Total raw materials” line item in question III-10a.

| Value (in \$1,000) | | | |
|--|-------|------|------|
| Item | Years | | |
| | 2022 | 2023 | 2024 |
| Internally-produced CSPV cells: | | | |
| Polysilicon, ingots | | | |
| Wafers | | | |
| All other raw material costs (CSPV cells) | | | |
| Direct labor (CSPV cells) | | | |
| Other factory costs (CSPV cells) | | | |
| Total cost of internally-produced CSPV cells | 0 | 0 | 0 |
| Purchased or imported CSPV cells: | | | |
| Domestically produced | | | |
| Subject foreign-produced | | | |
| Nonsubject foreign-produced | | | |
| Total cost of purchased/imported CSPV cells | 0 | 0 | 0 |
| Other purchased raw material costs: | | | |
| Backsheet costs | | | |
| Encapsulant (e.g., EVA) costs | | | |
| Framing costs | | | |
| Junction boxes costs | | | |
| Solar glass costs | | | |
| Other raw material costs | | | |
| Total all other raw material costs | 0 | 0 | 0 |
| Total raw material costs (these reported cost will automatically feed into question III-10a) | 0 | 0 | 0 |

III-10d. **MODULES: Explanation of trends.**—Indicate the primary decisions, events, or factors that impacted the trends in the following metrics as reported in question III-10a. Include information that may have impacted per unit sales and costs (e.g., product mix variations, patented product, etc.).

| Metric in III-10a | Explanation of trends from 2022 to 2024 |
|--|--|
| Commercial sales quantity and value (and fluctuations in sales unit values) | |
| Internal consumption quantity and value (and fluctuations in unit values) | |
| Transfers quantity and value (and fluctuations in unit values) | |
| Raw material costs | |
| Direct labor costs | |
| Energy and utilities (include where these costs are reported in III-10a) | |
| Other factory costs | |
| SG&A costs | |
| 45X MPTC/IRA income | |
| Other government incentives (list the specific programs) | |
| Other expenses/income and interest expenses (not related to government incentives) | |

III-10e. **MODULES: Variable costs and total manufacturing fixed costs.**—Estimate the share of variable costs included in each item reported in question III-10a on CSPV module operations and report the total fixed manufacturing costs in 2024.

| Item | Share of 2024: COGS (percent) | | Share of 2024: SG&A (percent) | |
|------------------------------|-------------------------------------|---|-------------------------------------|---|
| Share of costs that are: | | | | |
| Variable | | % | | % |
| Fixed | | % | | % |
| Total (should sum to 100.0%) | 0.0 | % | 0.0 | % |

III-10f. **MODULES: Depreciation expense.**—Please report the amount of depreciation expense that is included within the reported financial results at question III-10a.

| Item | Years | | |
|--|-------|------|------|
| | 2022 | 2023 | 2024 |
| Depreciation expense (<i>in \$1,000</i>) | | | |

III-10g. **MODULES: Depreciation expense classification.**—Please indicate the line item(s) within question III-10a (e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense reported above.

| |
|--|
| |
|--|

III-10h. **MODULES: Financial data reconciliation.**-- Certain line items from question III-10a, 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-10i. **MODULES: Financial data checklist.**—

| Confirm the following regarding your financial data in question III-10a: | √ if Yes |
|--|--------------------------|
| Commercial sales values in III-10a are net of (i.e., less) any discounts, returns, or allowances to customers? | <input type="checkbox"/> |
| Commercial sales values in III-10a exclude prepaid freight costs or other freight costs to customers from your U.S. point of shipment? | <input type="checkbox"/> |
| Internal consumption and transfers are reported at fair market value? | <input type="checkbox"/> |
| All COGS items exclude finished goods freight to customers? | <input type="checkbox"/> |
| <p>If you did not √ Yes in any of the boxes above, go back to the relevant question(s) in III-10a and revise your response or provide an explanation:</p> | |

III-11a. **Nonrecurring items (charges and gains) included in the CSPV cells and modules financial results.**—Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at questions III-9a/III-10a. If a nonrecurring item that is not product-specific was allocated to the results at questions III-9a/III-10a, 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 CSPV cells and/or modules in questions III-9a/III-10a.

| Value (\$1,000) | | | |
|--|-------|------|------|
| Item | Years | | |
| | 2022 | 2023 | 2024 |
| III-9a: Operations on CSPV cells (commercial sales and transfers)-- | | | |
| Nonrecurring item 1 | | | |
| Nonrecurring item 2 | | | |
| Nonrecurring item 3 | | | |
| Nonrecurring item 4 | | | |
| Nonrecurring item 5 | | | |
| Nonrecurring item 6 | | | |
| Nonrecurring item 7 | | | |
| III-10a: Operations on CSPV modules-- | | | |
| Nonrecurring item 1 | | | |
| Nonrecurring item 2 | | | |
| Nonrecurring item 3 | | | |
| Nonrecurring item 4 | | | |
| Nonrecurring item 5 | | | |
| Nonrecurring item 6 | | | |
| Nonrecurring item 7 | | | |

III-11b. **Nonrecurring items (charges and gains) included in the CSPV cells and modules financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within questions III-9a/III-10a in which the nonrecurring item is classified.

| Item | Description of the nonrecurring item | Location (i.e., line item) within question III-9a/III-10a |
|--|--------------------------------------|---|
| III-9a: Operations on CSPV cells (commercial sales and transfers)-- | | |
| Nonrecurring item 1 | | |
| Nonrecurring item 2 | | |
| Nonrecurring item 3 | | |
| Nonrecurring item 4 | | |
| Nonrecurring item 5 | | |
| Nonrecurring item 6 | | |
| Nonrecurring item 7 | | |
| III-10a: Operations on CSPV modules-- | | |
| Nonrecurring item 1 | | |
| Nonrecurring item 2 | | |
| Nonrecurring item 3 | | |
| Nonrecurring item 4 | | |
| Nonrecurring item 5 | | |
| Nonrecurring item 6 | | |
| Nonrecurring item 7 | | |

III-11c. **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-11a 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-11a identify the specific line items in questions III-9a/III-10a where these items are reported.

CELLS (III-9a): Nonrecurring items:

MODULES (III-10a): Nonrecurring items:

III-12a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of CSPV cells and modules. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for CSPV cells and modules 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 questions III-9a/III-10a.

Allocate the total dollar amount of your firm's CSPV cell assets separately for commercially sold and/or transferred CSPV cells (reported in question III-9a) and internally consumed CSPV cells (reported in question III-10a).

Note: Total assets should reflect the net amount of assets (i.e., after any accumulated depreciation and allowances deducted) and should be allocated to CSPV cells and modules if these assets are also related to other products. **DO NOT REPORT LIABILITIES.**

| Value (in \$1,000) | | | |
|---------------------------------------|-------|------|------|
| Item | Years | | |
| | 2022 | 2023 | 2024 |
| CELLS: Assets (net)-- | | | |
| Used for commercial sales & transfers | | | |
| Used for internal consumption | | | |
| CELLS: Total assets (net) | 0 | 0 | 0 |
| MODULES: 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.

| |
|----------------------------|
| CELLS: Net assets |
| MODULES: Net assets |

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

| Value (in \$1,000) | | | |
|----------------------|-------|------|------|
| Item | Years | | |
| | 2022 | 2023 | 2024 |
| CELLS: | | | |
| Capital expenditures | | | |
| R&D expenses | | | |
| MODULES: | | | |
| 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.

| |
|--------------------------------------|
| CELLS: Capital expenditures |
| MODULES: Capital expenditures |

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

| |
|-------------------------|
| CELLS: R&D |
| MODULES: R&D |

III-14a. **Data consistency and reconciliation.**—The quantities and values of total net sales reported in question III-9a on cells should reconcile with the U.S. shipments, transfers to related firms, and exports (do not include internal consumption of cells) reported in question II-8; module question III-10a should reconcile with the total shipments reported in question II-11 (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis. The interim-period data should reconcile whether the financial data are on a calendar- or fiscal-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.

CELLS (commercial sales and transfers only)

| Reconciliation | Years | | |
|---|-------|------|------|
| | 2022 | 2023 | 2024 |
| CELLS quantity: Trade data from question II-8 (lines D, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0"). | 0 | 0 | 0 |
| CELLS value: Trade data from question II-8 (lines E, I, and K) less financial total net sales value data from question III-9a, = zero ("0"). | 0 | 0 | 0 |

Are the financial data in question III-9a on CSPV cells reported on a calendar-year basis?

☐ Yes— Complete question III-14b.

☐ No— Complete question III-14c.

MODULES (commercial sales, internal consumption, and transfers)

| Reconciliation | Years | | |
|--|-------|------|------|
| | 2022 | 2023 | 2024 |
| MODULES quantity: Trade data from question II-11 (lines AB, AD, AF, and AH) less financial total net sales quantity data from question III-10a, = zero ("0"). | 0 | 0 | 0 |
| MODULES value: Trade data from question II-11 (lines AC, AE, AG, and AI) less financial total net sales value data from question III-10a, = zero ("0"). | 0 | 0 | 0 |

Is the financial data in question III-10a on CSPV modules reported on a calendar-year basis?

☐ Yes— Complete question III-14b.

☐ No— Complete question III-14c.

III-14b. **Data consistency and reconciliation (calendar-year based financial data).**—Do the data in questions III-9a/III-10a reconcile with the data in questions II-8/II-11 (i.e., the calculated fields are returning zeros in the table above) for all periods?

| | | |
|--|--------------------------|-------------------------------|
| CELLS (commercial sales and transfers only)---Reconciliation of questions II-8 and III-9a: | | |
| Yes | No | If no, please explain. |
| <input type="checkbox"/> | <input type="checkbox"/> | |
| MODULES (commercial sales, internal consumption, and transfers)--Reconciliation of questions II-11 and III-10a: | | |
| Yes | No | If no, please explain. |
| <input type="checkbox"/> | <input type="checkbox"/> | |

III-14c. **Data consistency and reconciliation (non-calendar-year based financial data).**—Do the data in questions III-9a/III-10a reconcile with the data in questions II-8/II-11 (i.e., the calculated fields are returning zeros) for the January-September periods?

| | | |
|--|--------------------------|-------------------------------|
| CELLS (commercial sales and transfers only)--Reconciliation of questions II-8 and III-9a: | | |
| Yes | No | If no, please explain. |
| <input type="checkbox"/> | <input type="checkbox"/> | |
| MODULES (commercial sales, internal consumption, and transfers)--Reconciliation of questions II-11 and III-10a: | | |
| Yes | No | If no, please explain. |
| <input type="checkbox"/> | <input type="checkbox"/> | |

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country or product type (e.g., cells vs modules), please describe these differences and, as applicable, indicate which countries or product types (e.g., cells vs modules) your response refers to in the relevant form fields.

- III-15. **Effects of imports on investment.**—Since January 1, 2022, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of CSPV cells and modules from Cambodia, Malaysia, Thailand, and Vietnam?

| | | |
|--------------------------|--------------------------|--|
| No | Yes | If yes, my firm has experienced actual negative effects as follows: |
| <input type="checkbox"/> | <input type="checkbox"/> | |

| <i>(check as many as appropriate)</i> | | <i>(please describe)</i> |
|---------------------------------------|--|--------------------------|
| <input type="checkbox"/> | Cancellation, postponement, or rejection of expansion projects | |
| <input type="checkbox"/> | Denial or rejection of investment proposal | |
| <input type="checkbox"/> | Reduction in the size of capital investments | |
| <input type="checkbox"/> | Return on specific investments negatively impacted | |
| <input type="checkbox"/> | Other | |

- III-16. **Effects of imports on growth and development.**—Since January 1, 2022, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of CSPV cells and modules from Cambodia, Malaysia, Thailand, and Vietnam?

| | | |
|--------------------------|--------------------------|--|
| No | Yes | |
| <input type="checkbox"/> | <input type="checkbox"/> | If yes, my firm has experienced actual negative effects as follows: |

| <i>(check as many as appropriate)</i> | | <i>(please describe)</i> |
|---------------------------------------|---|--------------------------|
| <input type="checkbox"/> | Rejection of bank loans | |
| <input type="checkbox"/> | Lowering of credit rating | |
| <input type="checkbox"/> | Problem related to the issue of stocks or bonds | |
| <input type="checkbox"/> | Ability to service debt | |
| <input type="checkbox"/> | Other | |

- III-17. **Anticipated effects of imports.**—Does your firm anticipate any negative effects due to imports of CSPV cells and modules from Cambodia, Malaysia, Thailand, and Vietnam?

| No | Yes | If yes, my firm anticipates negative effects as follows: |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- III-18. **Effects on financial performance of COVID-19.**—Since January 1, 2022, has the COVID-19 pandemic, or any government actions taken to contain the spread of the COVID-19 virus, affected the financial performance of your firm's operations on CSPV cells and modules as reported in question III-9a? In your response, please include the duration and timing of any impacts as they relate to your firm's financial performance.

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

- III-19. **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 Andres Andrade (202-205-2078, Andres.Andrade@usitc.gov).

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

| | |
|-----------|--|
| Name | |
| Title | |
| Email | |
| Telephone | |

PRICE DATA

- IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2022 of the following products produced by your firm.

Product 1.-- Monocrystalline silicon module with front-side area of less than 2.2 square meters and a peak power wattage between 380w and 450w, inclusive, P-max or Wp as measured under Standard Test Conditions (STC), excluding bifacial modules.

Product 2.-- Monocrystalline silicon module with front-side area of greater than or equal to 2.2 square meters and a peak power wattage between 320w and 440w, inclusive, P-max or Wp as measured under STC, excluding bifacial modules.

Product 3.-- Monocrystalline silicon bifacial module that generates power on both sides of the panel with a front-side area of greater than or equal to 1.9 square meters and a peak power wattage between 320w and 450w, inclusive, P-max or Wp as measured under STC.

Product 4.-- Monocrystalline silicon bifacial module that generates power on both sides of the panel with front-side area of greater than or equal to 1.9 square meters and a peak power wattage greater than or equal to 485w, inclusive, P-max or Wp as measured under STC.

Please note that values should be f.o.b., U.S. point of shipment and should not include U.S.-inland transportation costs. Values should reflect the *final net* amount paid to your firm (i.e., should be net of all deductions for discounts or rebates).

- IV-2a. During 2022 through 2024, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

| | |
|--------------------------|--|
| <input type="checkbox"/> | Yes. --Please complete the following pricing data table(s), as appropriate. |
| <input type="checkbox"/> | No. --Skip to question IV-3. |

IV-2b. **Price data.**--Report below the quarterly price data¹ for pricing products² produced and sold by your firm.

Report data in **kilowatts** and **actual dollars** (not \$1,000s).

| (Quantity in kilowatts, value in dollars) | | | | | | | | |
|---|-----------|-------|-----------|-------|-----------|-------|-----------|-------|
| Period of shipment | Product 1 | | Product 2 | | Product 3 | | Product 4 | |
| | Quantity | Value | Quantity | Value | Quantity | Value | Quantity | Value |
| 2022: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2023: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |
| 2024: | | | | | | | | |
| January-March | | | | | | | | |
| April-June | | | | | | | | |
| July-September | | | | | | | | |
| October-December | | | | | | | | |

¹ Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred.

² Pricing product definitions are provided on the first page of Part IV.

Note.--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:

IV-2c. **Price data checklist.**--Please check that the pricing data in question IV-2b have been correctly reported.

| | |
|--|--------------------------|
| Are the price data reported above: | ✓ if Yes |
| In actual dollars (not \$1,000s) and kilowatts? | <input type="checkbox"/> |
| Valued f.o.b. U.S. point of shipment (i.e., exclude U.S. inland transportation costs)? | <input type="checkbox"/> |
| Reported net of all discounts, rebates, and returns (deducted from the quarter in which the original sale occurred)? | <input type="checkbox"/> |
| Reported for commercial U.S. shipments only (i.e., exclude internal consumption, transfers, and exports)? | <input type="checkbox"/> |
| Less than or equal to the quantities and values reported in part II for commercial U.S. shipments in each period? | <input type="checkbox"/> |
| Explanation(s) for any boxes not checked: | |

IV-2d. **Pricing data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your price data.

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

If any of your responses differ between cells and modules, please indicate such differences in the most relevant narrative form field within that question. If you are unable to clarify any difference in a narrative form field within that question, please report the differences in question IV-28.

- IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of CSPV cells and/or modules (*check all that apply*)?

| Transaction by transaction | Contracts | Set price lists | Other | If other, describe |
|----------------------------|--------------------------|--------------------------|--------------------------|--------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

- IV-4. **Discount policy.**--Please indicate and describe your firm's discount policies (*check all that apply*).

| Quantity discounts | Annual total volume discounts | No discount policy | Other | Describe |
|--------------------------|-------------------------------|--------------------------|--------------------------|----------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

- IV-5. **Pricing terms.**--On what basis are your firm's prices of domestic CSPV cells and modules usually quoted (*check one*)?

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

- IV-6. **Contract versus spot.**--Approximately what shares of your firm's sales of its U.S.-produced CSPV cells and CSPV modules in 2024 were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

| Item | Product | Type of sale | | | | |
|---------------------|--------------|---|---|--|---------------------------------------|------------------------------|
| | | Short-term contracts (multiple deliveries for less than 12 months) | Annual contracts (multiple deliveries for 12 months) | Long-term contracts (multiple deliveries for more than 12 months) | Spot sales (for a single delivery) | Total (should sum to 100.0%) |
| Share of 2024 sales | CSPV cells | % | % | % | % | 0.0 % |
| Share of 2024 sales | CSPV modules | % | % | % | % | 0.0 % |

IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced CSPV cells and modules (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

| Typical sales contract provisions | Item | Short-term contracts (multiple deliveries for less than 12 months) | Annual contracts (multiple deliveries for 12 months) | Long-term contracts (multiple deliveries for more than 12 months) |
|---|-------------|---|---|--|
| Average contract duration | No. of days | | 365 | |
| Price renegotiation (during contract period) | Yes | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | No | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Fixed quantity and/or price | Quantity | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Price | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | Both | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Indexed to raw material costs ¹ | Yes | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | No | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Not applicable | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ¹ Please identify the indexes used: _____. | | | | |

IV-8. **Lead times.**--What share of your firm's sales of its U.S.-produced CSPV cells and modules was from inventory and produced to order, and what was the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced CSPV cells and modules?

| Source | Share of 2024 sales | Lead time (Average number of days) |
|-------------------------------------|---------------------|------------------------------------|
| From inventory | % | |
| Produced to order | % | |
| Total (should sum to 100.0%) | 0.0 % | |

IV-9. Shipping information.--

- (a) Who generally arranges the transportation to your firm's customers' locations?
☐ Your firm ☐ Purchaser (*check one*)
- (b) Indicate the approximate percentage of your firm's sales of CSPV cells and/or modules that are delivered the following distances from its 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 CSPV cells and/or modules since January 1, 2022 (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. **Inland transportation costs.**—What is the approximate percentage of the cost of U.S.-produced CSPV cells and modules that is accounted for by U.S. inland transportation costs? _____ percent

IV-12. End uses.--

- (a) List the top 3 products your firm makes using CSPV cells and estimate the percent of your total production cost that is accounted for by CSPV cells and by other inputs (such as labor, energy, and other raw materials).

| Product(s) your firm produces | Share of total cost in each of the product(s) your firm produces accounted for by | | | | Total (should sum to 100.0% across) |
|-------------------------------|---|---|--------------|---|--|
| | CSPV cells | | Other inputs | | |
| | % | + | % | = | 0.0 % |
| | % | + | % | = | 0.0 % |
| | % | + | % | = | 0.0 % |

- (b) List the top 3 products your firm makes using CSPV modules and estimate the percent of your total production cost that is accounted for by CSPV modules and by other inputs (such as labor, energy, and other raw materials).

| Product(s) your firm produces | Share of total cost in each of the product(s) your firm produces accounted for by | | | | Total (should sum to 100.0% across) |
|-------------------------------|---|---|--------------|---|--|
| | CSPV modules | | Other inputs | | |
| | % | + | % | = | 0.0 % |
| | % | + | % | = | 0.0 % |
| | % | + | % | = | 0.0 % |

IV-13. Substitutes--

(a) Can other products be substituted for CSPV cells?

☐ No

☐ Yes--Please fill out the table.

| Substitute | End use in which this substitute is used | Have changes in the price of this substitute affected the price for CSPV cells? | | |
|------------|--|---|--------------------------|-------------|
| | | No | Yes | Explanation |
| 1. | | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. | | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. | | <input type="checkbox"/> | <input type="checkbox"/> | |

(b) Can other products be substituted for CSPV modules?

☐ No

☐ Yes--Please fill out the table.

| Substitute | End use in which this substitute is used | Have changes in the price of this substitute affected the price for CSPV modules? | | |
|------------|--|---|--------------------------|-------------|
| | | No | Yes | Explanation |
| 1. | | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. | | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. | | <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 CSPV cells and modules steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2022? Explain any trends and describe the principal factors that have affected these changes in demand.

Select one box per row.

| Market | Steadily increase | Fluctuate up | No change | Fluctuate down | Steadily decrease | Explanation and factors |
|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------------|
| Within the United States (Cells) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Outside the United States (Cells) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Within the United States (Modules) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Outside the United States (Modules) | <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 CSPV cells/or and modules since January 1, 2022?

| No | Yes | If yes, please describe and quantify if possible. |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- IV-16. **Business cycles.**--Is the CSPV cells and modules 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, 2022. |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

IV-17. **Conditions of competition.**--

- (a) Is the CSPV cells market subject to conditions of competition distinctive to CSPV cells 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, 2022. |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- (b) Is the CSPV modules market subject to conditions of competition distinctive to CSPV modules 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, 2022. |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- IV-18. **Government incentives.**--Have there been any changes in the level and/or availability of government incentives for CSPV cells and/or modules since January 1, 2022? If yes, please list the incentive program (e.g. Solar Investment Tax Credit, Section 1603 Program, Renewable Portfolio Standards, Solar Energy Manufacturing for America Act, Inflation Reduction Act, California Solar Initiative, and/or tariff holiday), whose change has affected the CSPV cells and modules market.

| No | Yes | If yes, fill out the table below. |
|--------------------------|--------------------------|-----------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | |

| Program | Changes in the level and/or availability | Have changes in the level or availability of this program affected the price for CSPV cells and/or modules? | | |
|---------|--|---|--------------------------|-------------|
| | | No | Yes | Explanation |
| 1. | | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. | | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. | | <input type="checkbox"/> | <input type="checkbox"/> | |

IV-19. **Supply constraints.**—

- (a) Has your firm refused, declined, or been unable to supply CSPV cells and/or modules at any time since January 1, 2022 (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, impact from changes in operations listed in II-2a, etc.)?

| No (skip to IV-20) | Yes (respond to part b) |
|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> |

- (b) For each year that your firm faced supply constraints, describe the constraints with the details requested below.

| Check if yes | Period | Description: include the timing, duration, and reason for the constraint. |
|--------------------------|---------------------------------|---|
| <input type="checkbox"/> | 2022 | |
| <input type="checkbox"/> | 2023 | |
| <input type="checkbox"/> | January 1- April 24, 2024 | |
| <input type="checkbox"/> | Since April 24, 2024 | |

- IV-20. **Raw materials.**-- Have raw material prices for CSPV cells and/or modules steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2022?

Select one box per row.

| 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 CSPV cells and/or modules. |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

- IV-21. **Engineering, Procurement, and Construction ("EPC") services.**--

- (a) Do you sell or bundle EPC or other development services together with CSPV cells and/or modules?

| No (skip to IV-22) | Yes (respond to part b) |
|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> |

- (b) Please report what share of your sales of CSPV cells and/or modules in 2024 were bundled with these services.

| Service type | Share of 2024 sales |
|---|---------------------|
| EPC service | % |
| Other development service ¹ | % |
| ¹ Please describe the type of service: | |

IV-22. **Interchangeability.**—How often are CSPV cells and/or modules 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

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

The columns and rows for Cambodia, Malaysia, Thailand, and Vietnam indicate CSPV cells and modules from subject sources. Please provide comparisons for CSPV cells and modules from nonsubject sources in Cambodia, Malaysia, Thailand, and Vietnam in the “Circumventing sources” row and column.

| Country-pair | Cambodia (Subject) | Malaysia (Subject) | Thailand (Subject) | Vietnam (Subject) | South Korea | Circumventing sources | Other countries |
|---|-----------------------|-----------------------|-----------------------|----------------------|----------------|--------------------------|--------------------|
| United States | | | | | | | |
| Cambodia (Subject) | | | | | | | |
| Malaysia (Subject) | | | | | | | |
| Thailand (Subject) | | | | | | | |
| Vietnam (Subject) | | | | | | | |
| South Korea | | | | | | | |
| Circumventing sources | | | | | | | |
| For any country-pair producing CSPV cells and modules that are <i>sometimes</i> or <i>never</i> interchangeable, please identify the country-pair and explain the factors that limit or preclude the interchangeable use of CSPV cells and modules produced in the countries: | | | | | | | |

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

| Country-pair | Cambodia (Subject) | Malaysia (Subject) | Thailand (Subject) | Vietnam (Subject) | South Korea | Circumventing sources | Other countries |
|-----------------------|-----------------------|-----------------------|-----------------------|----------------------|----------------|--------------------------|--------------------|
| United States | | | | | | | |
| Cambodia (Subject) | | | | | | | |
| Malaysia (Subject) | | | | | | | |
| Thailand (Subject) | | | | | | | |
| Vietnam (Subject) | | | | | | | |
| South Korea | | | | | | | |
| Circumventing sources | | | | | | | |

For any country-pair for which factors other than price are *always* or *frequently* a significant factor in your firm's sales of CSPV cells and/or modules, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:

- IV-24. **Role of section 301 tariffs.**-- Did the tariffs on Chinese-origin products under section 301, or changes in these tariffs (including the announced 50 percent tariff on cells and modules imported from China (89 FR 76581; September 18, 2024)), have an impact on the CSPV cells and modules market in the United States, including any effects on the cost, price, supply, and demand for CSPV cells and/or modules , since January 1, 2022?

| Yes | No | Don't know |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If yes, please describe the impact on cost, price, supply, and/or demand, and include the timing of such impacts.

| |
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- IV-25. **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 CSPV cells and modules market in the United States, including any effects on the cost, price, supply, and/or demand for CSPV cells and/or modules, since January 1, 2022?

| Yes | No | Don't know |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If yes, please describe the impact on cost, price, supply, and/or demand, and include the timing of such impacts.

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IV-26. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for CSPV cells and/or modules since January 1, 2022. Indicate the share of the quantity of your firm's U.S. shipments of CSPV cells and/or modules that each of these customers accounted for in 2024.

| | Customer's name | City | State | Share of 2024 sales (%) |
|----|-----------------|------|-------|-------------------------|
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |
| 6 | | | | |
| 7 | | | | |
| 8 | | | | |
| 9 | | | | |
| 10 | | | | |

IV-27. Competition from imports.--

- (a) **Lost revenue.**--Since January 1, 2022: To avoid losing sales to competitors selling CSPV cells and modules from Cambodia, Malaysia, Thailand, and/or Vietnam, did your firm:

| Item | No | Yes |
|-------------------------------------|--------------------------|--------------------------|
| Reduce prices | <input type="checkbox"/> | <input type="checkbox"/> |
| Roll back announced price increases | <input type="checkbox"/> | <input type="checkbox"/> |

- (b) **Lost sales.**--Since January 1, 2022: Did your firm lose sales of CSPV cells and modules to imports of this product from Cambodia, Malaysia, Thailand, and/or Vietnam?

| No | Yes |
|--------------------------|--------------------------|
| <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 for which a narrative response 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.

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PART V.—MATERIAL RETARDATION AND SEMI-FINISHED PRODUCT ANALYSIS

Further information on this part of the questionnaire can be obtained from Julie Duffy (202-708-2579, julie.duffy@usitc.gov). Supply all data requested on a calendar-year basis.

- V-1. **Trial production commencement.**—Please indicate whether your firm has commenced trial production of CSPV cells since January 1, 2022.

| No | Yes | If yes, specify the date commenced (month, day, year) and the production volumes (in kilowatts): |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- V-2. **Commercial production commencement.**—Please indicate whether your firm has commenced commercial production of CSPV cells since January 1, 2022.

| No | Yes | If yes, specify the date commenced (month, day, year) and the production volumes (in kilowatts): |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- V-3. After having commenced commercial production of CSPV cells, did your firm subsequently suspend or cease production at any time after January 1, 2022?

| No | Yes | If yes, specify (1) the date (month, day, year) of non-production and (2) the date (month, day, year) of recommencement: |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- V-4. Did your firm produce CSPV cells prior to January 1, 2022? other products at its facility prior to producing CSPV cells?

| No | Yes | If yes, specify the date (month, day, year) of when your firm ceased production of CSPV cells: |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- V-5. **Marketing strategy.**--Please describe the ways in which your firm marketed CSPV cells, and provide any supporting documentation, including any reports your firm prepared or commissioned for your firm's CSPV cells operations regarding efforts that your firm made to market its product.

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- V-6. **Business plans.**—Please indicate whether the following were prepared and/or commissioned by your firm: Studies, business plans, cost or sales projections, engineering test results, or correspondence concerning the feasibility, cost, and/or desirability of manufacturing CSPV cells.

| | | |
|--------------------------|--------------------------|---|
| No | Yes | |
| <input type="checkbox"/> | <input type="checkbox"/> | If yes, please be prepared to make such documents available to the Commission upon request. |

- V-7. **Projected production of CSPV cells.**—Please report your firm's projected capacity and production of CSPV cells in 2025 and 2026.

"Practical 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.

"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.

| Quantity (in kilowatts) | | |
|---|---------------|------|
| Item | Calendar year | |
| | 2025 | 2026 |
| Practical production capacity of CSPV cells | | |
| Trial production of CSPV cells | | |
| Commercial production of CSPV cells | | |
| Total production of CSPV cells | 0 | 0 |

- V-8. **Semi-finished product analysis.**--Please answer the following questions regarding the differences and similarities in unfinished product(s) and finished product(s) in this proceeding as defined below:

“Unfinished product(s)” – CSPV cells.

“Finished product(s)” – CSPV modules.

- (i) Are there uses for the unfinished product(s) other than for the production of the finished product(s)

| No | Yes | If yes--Please describe these uses. |
|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- (ii) Is the market for unfinished product(s) separate and distinct from the market for finished product(s)?

| No | Yes | If yes--Please describe how they are separate and distinct. |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- (iii) Are there differences in the physical characteristics and functions of the unfinished product(s) and finished products(s)?

| No | Yes | If yes--Please describe these differences. |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- (iv) Is there a significant difference in the cost or value between unfinished product(s) and finished product(s)?

| No | Yes | If yes--Please describe these differences. |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- (v) Would you describe the processes used to transform the unfinished product(s) into the finished product(s) as significant and particularly labor or capital intensive?

| No | Yes | If yes--Please describe the labor or capital intensively of the conversion process. |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | |

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 of further instructions.

• **Upload via Commission’s secure submission portal.**— The questionnaire must be uploaded in two formats: (1) a Microsoft Word 97-2003 document; and (2) a PDF copy of the complete questionnaire with a signature on the first page. Please include any attachments at the end of the PDF (e.g., APO certification, additional comments, etc.).

Web address: <https://usitc.gov/qportal> **Pin:** CSPV **Phase:** Final

• **E-mail.**— *E-mail the MS Word questionnaire to julie.duffy@usitc.gov; include a PDF copy of the complete questionnaire with a signature on the first page. 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 submission portal 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 PDF copy via the Commission’s secure submission portal or email.

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.