

FOREIGN PRODUCERS'/EXPORTERS' 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.

Name of firm _____

Address _____

Website _____

Has your firm produced or exported CSPV cells and modules (as defined on next page) 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)

Data reported in this questionnaire relate to (Check one):

☐ Cambodia ☐ Malaysia ☐ Thailand ☐ Vietnam

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 May 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/8558>.

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 "**laminated**" 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, purchaser and/or foreign producer questionnaire), you need not respond to duplicated questions.

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.

Valid number error messages.--If you are completing this form in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 rather than \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete this form. Detailed instructions on how to resolve this issue is provided at the end of this questionnaire and is available upon request from Julie Duffy (202-708-2579, julie.duffy@usitc.gov).

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

| Hours | Dollars |
|-------|---------|
| | |

Public reporting burden for this questionnaire is estimated to average 30 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-2. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire.

"Establishment"--Each facility of a firm in Cambodia, Malaysia, Thailand, and Vietnam involved in the production or export of CSPV cells and modules, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities. Firms operating more than one establishment in Cambodia, Malaysia, Thailand, and Vietnam should combine the data for all establishments into a single report.

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

“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-3. **Related producers.**--Does your firm or any related firm produce, have the capability to produce, or have any plans to produce CSPV cells and modules in the United States or other countries?

| | | |
|--------------------------|--------------------------|--|
| No | Yes | If yes, please name the firm(s) and country(ies) below and, if U.S. producer(s), ensure that they complete the Commission’s producer questionnaire. |
| <input type="checkbox"/> | <input type="checkbox"/> | |

- I-4. **Related U.S. importers.**--Does your firm or any related firm import or have any plans to import CSPV cells and modules into the United States?

| | | |
|--------------------------|--------------------------|---|
| No | Yes | If yes, please name the firm(s) below and ensure that they complete the Commission’s importer questionnaire. |
| <input type="checkbox"/> | <input type="checkbox"/> | |

- I-5. **Stock symbol information.**-- If your firm or any of the entities reported in questions I-2 through I-4 are publicly traded in the United States, please specify the stock exchange and trading symbol (including American Depositary Receipts, if applicable): _____.

- I-6. **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-7. **U.S. importers.**--Please provide the names, contacts, telephone numbers, and e-mail addresses of the **TEN** largest U.S. importers of your firm's CSPV cells and modules since January 1, 2022.

| Importer's name | | Contact person | Email | Telephone | Share of your firm's 2024 U.S. exports (%) |
|-----------------|--|----------------|-------|-----------|--|
| 1 | | | | | |
| 2 | | | | | |
| 3 | | | | | |
| 4 | | | | | |
| 5 | | | | | |
| 6 | | | | | |
| 7 | | | | | |
| 8 | | | | | |
| 9 | | | | | |
| 10 | | | | | |

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, and shipments (including exports to the United States) 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 and (b) production and shipments 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 them. |
| <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 establishment(s) in Cambodia, Malaysia, Thailand, and Vietnam, 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*

Data reported in this section should include capacity regardless of if the production is excluded from the scope by virtue of Commerce's antidumping and countervailing duty orders on Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China.

CSPV cells

| Quantity (in kilowatts) | | | |
|--|---------------|------|------|
| Item | 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 ⁴ | 0 | 0 | 0 |
| Other products ⁵ | | | |
| 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-9 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 modules then "practical overall" and "practical CSPV modules" capacity measures should be equal to each other.</p> <p>⁵ Please identify these products: _____.</p> | | | |

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

Data reported in this section should include capacity regardless of if the production is excluded from the scope by virtue of Commerce's antidumping and countervailing duty orders on Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China.

CSPV modules

| Item | Quantity (<i>in kilowatts</i>) | | |
|--|----------------------------------|------|------|
| | 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-10 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 capacities reported in II-3a, and explain any changes in reported capacities.

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

- 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 question II-3a. 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 (check as many as appropriate) | | Description (If checked, please describe the details, timing, and duration of the constraint; leave completely blank if not applicable) |
|--|--|--|
| <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.

| |
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- 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.

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| |
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- 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.

| |
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| |
|--|

- 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. **Share of sales.**--What percentage of your firm's total sales in its most recent fiscal year was represented by sales of CSPV cells and modules? ____ percent.
- II-7a. **Firm's estimated share of production (CSPV cells).**--Please estimate the percentage of total production of CSPV cells in the country specified on the certification page accounted for by your firm's production in 2024. ____ percent.
- II-7b. **Firm's estimated share of production (CSPV modules).**--Please estimate the percentage of total production of CSPV modules in the country specified on the certification page accounted for by your firm's production in 2024. ____ percent.
- II-7c. **Firm's estimated share of exports (CSPV cells).**--Please estimate the percentage of total exports to the United States of CSPV cells from the country specified on the certification page accounted for by your firm's exports in 2024. ____ percent.
- II-7d. **Firm's estimated share of exports (CSPV modules).**--Please estimate the percentage of total exports to the United States of CSPV modules from the country specified on the certification page accounted for by your firm's exports in 2024. ____ percent.

- II-8. **Third country trade actions.**--Is the CSPV cells and modules exported by your firm subject to antidumping/countervailing duty/safeguard findings, remedies, or proceedings?

| No | Yes | If yes--List the products(s), countries affected, and the date of such findings/remedies/proceedings. |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | |

- II-9. **Trade data.**--Report your firm's capacity, production, shipments, and inventories related to the production of CSPV cells and modules in your establishment(s) in Cambodia, Malaysia, Thailand, and Vietnam during the specified periods. Do not include resales of CSPV cells and modules that your firm did not produce in this question; those data to the degree they are exported to the United States should only be reported in question II-10.

Do not submit data by manufacturing facility if they are in the same country. If your firm has multiple manufacturing establishments within one country, you are required to combine data for those establishments within one foreign producer questionnaire response.

Do not submit data on multiple countries combined. The establishments reported here should all be located in the country of the firm's address reported on the certification page. Multinational companies with production in multiple subject countries should submit separate foreign producer questionnaire responses for each subject country.

"Shipments"--Shipments of products produced in your establishment(s) in Cambodia, Malaysia, Thailand, and Vietnam. Quantities reported should be net of returns.

"Home market commercial shipments"--Shipments, other than internal consumption and transfers to related firms, within Cambodia, Malaysia, Thailand, and Vietnam.

"Home market internal consumption/transfers to related firms"--Shipments made to related firms in Cambodia, Malaysia, Thailand, and Vietnam, including product consumed internally by your firm.

"Export shipments"--Shipments to destinations outside of the country indicated on page 1 (Cambodia, Malaysia, Thailand, and Vietnam), 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-9. **Trade data.**--Continued.

Data reported should relate to cells manufactured in the country specified in the certification page. Provide production and capacity data (lines A and C) for all CSPV cells regardless of whether or not the CSPV cells are excluded from the scope by virtue of Commerce's antidumping and countervailing duty orders on Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China.

CSPV cells

| Quantity (in kilowatts) | | | | | |
|---|---------------|------|------|--------------------------|------|
| Item | Calendar year | | | Projections ¹ | |
| | 2022 | 2023 | 2024 | 2025 | 2026 |
| Practical CSPV cells capacity² (A) | | | | | |
| Beginning-of-period inventories (B) | | | | | |
| Production² (C) | | | | | |
| Home market shipments: Internal consumption/ transfers (D) | | | | | |
| Commercial shipments (E) | | | | | |
| Export shipments: to the United States (F) | | | | | |
| to all other markets (G) ³ | | | | | |
| Total exports (H) | 0 | 0 | 0 | 0 | 0 |
| Total shipments (I) | 0 | 0 | 0 | 0 | 0 |
| End-of-period inventories (J) | | | | | |
| ¹ Explain the basis of your firm's projections: _____. ² Report your firm's practical CSPV cells and modules capacity consistent with the definitions and instructions included in question II-3a. ³ Identify your firm's principal other export markets: _____. | | | | | |

RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.--Generally, the data reported for the end-of-period inventories (i.e., line J) 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, E, F, and G). Please ensure that any differences are not due to data entry errors in completing this form, but rather actually reflect your firm's records; and also provide any likely explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

| Item | Actual experience | | | Projections | |
|---|-------------------|------|------|-------------|------|
| | 2022 | 2023 | 2024 | 2025 | 2026 |
| B + C – D – E – F – G – J = should equal zero ("0") or provide an explanation. ¹ | 0 | 0 | 0 | 0 | 0 |
| ¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____. | | | | | |

- II-10. **Exports to the United States not produced by your firm.**--Report your firm's exports to the United States of CSPV cells that were produced in Cambodia, Malaysia, Thailand, or Vietnam and Note these data should **not** be included in question II-8.

| Quantity (<i>in kilowatts</i>) | | | | | |
|--|-------------------|------|------|-------------|------|
| Item | Actual experience | | | Projections | |
| | 2022 | 2023 | 2024 | 2025 | 2026 |
| Exports of CSPV cells to the United States not produced by your firm ¹ | | | | | |
| ¹ List the producer(s). _____. | | | | | |

II-11. **Trade data (CSPV modules).**

Data reported should relate to CSPV modules made from cells originating in the country specified in the certification page (i.e., Cambodia, Malaysia, Thailand, or Vietnam) regardless of the country of module assembly or country of exportation.

Data reported should relate to cells manufactured in the country specified in the certification page. Provide production and capacity data (lines A and C) for all CSPV modules regardless of whether or not the CSPV modules are excluded from the scope by virtue of Commerce's antidumping and countervailing duty orders on Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules, from the People's Republic of China.

CSPV modules

| Quantity (in kilowatts) | | | | | |
|---|---------------|------|------|--------------------------|------|
| Item | Calendar year | | | Projections ¹ | |
| | 2022 | 2023 | 2024 | 2025 | 2026 |
| Practical CSPV modules capacity² (K) | | | | | |
| Beginning-of-period inventories (L) | | | | | |
| Production² (M) | | | | | |
| Home market shipments: | | | | | |
| Internal consumption/ transfers (N) | | | | | |
| Commercial shipments (O) | | | | | |
| Export shipments: | | | | | |
| to the United States (P) | | | | | |
| to all other markets (Q) ³ | | | | | |
| Total exports (R) | 0 | 0 | 0 | 0 | 0 |
| Total shipments (S) | 0 | 0 | 0 | 0 | 0 |
| End-of-period inventories (T) | | | | | |
| ¹ Explain the basis of your firm's projections: _____. ² Report your firm's practical CSPV cells and modules capacity consistent with the definitions and instructions included in question II-3a. ³ Identify your firm's principal other export markets: _____. | | | | | |

II-11. **Trade data (CSPV modules).**--Continued.

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

| Item | Actual experience | | | Projections | |
|--|-------------------|------|------|-------------|------|
| | 2022 | 2023 | 2024 | 2025 | 2026 |
| B + C – D – E – F – G – J = should equal zero ("0") or provide an explanation. ¹ | 0 | 0 | 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. **Exports to the United States not produced by your firm.**--Report your firm's exports to the United States of CSPV modules that were assembled using cells produced in Cambodia, Malaysia, Thailand, or Vietnam, but not by your firm during the specified periods. Note these data should **not** be included in question II-11.

| Quantity (in kilowatts) | | | | | |
|--|-------------------|------|------|-------------|------|
| Item | Actual experience | | | Projections | |
| | 2022 | 2023 | 2024 | 2025 | 2026 |
| Exports of <u>CSPV modules</u> to the United States not produced by your firm ¹ | | | | | |
| ¹ List the producer(s). _____. | | | | | |

II-13. **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, including but not limited to technical issues with the MS Word questionnaire.

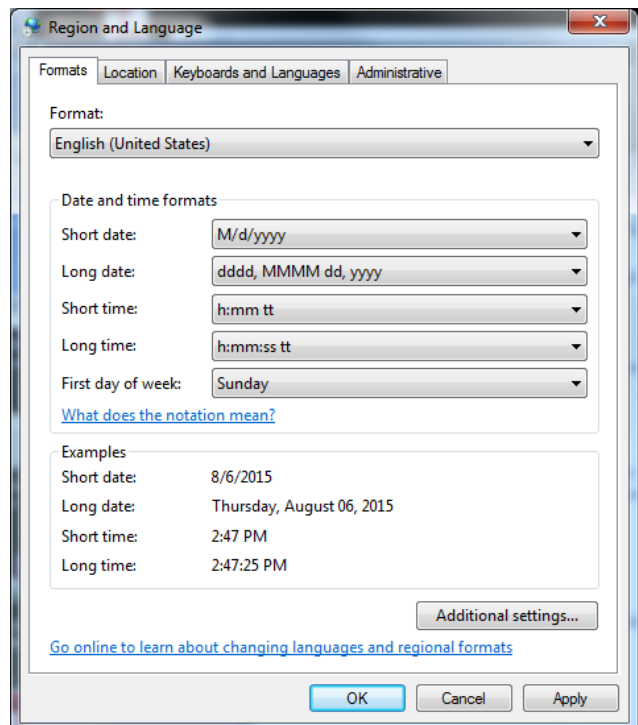
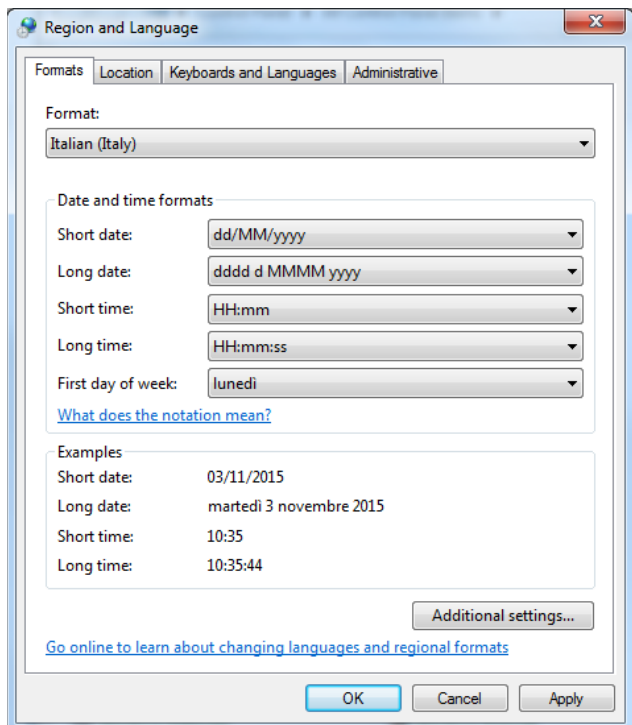
Correcting Valid number error messages.--If you are completing this questionnaire in a country that uses periods (".") to delineate multiples of 1000 (e.g., one million would appear as \$1.000.000 instead of as \$1,000,000), you may be unable to enter in numbers greater than 999 in numeric form fields. This issues stem from your computer number formatting setting (e.g., not the MS Word document itself, but the computer from which you are opening up the document). In the United States commas (,) delineate multiples of 1000 and periods (.) delineate fractions less than one. Many EU countries use the reverse where multiples of 1000 are delineated with periods (.) and fractions less than one are delineated with commas (,). This questionnaire is prepared in the United States with the U.S. number formatting. When this formatting interacts with a computer set to EU number formatting, we believe this may cause this issue.

The solution to this data entry issue is to temporarily change your operating system's number formatting to be consistent with the U.S. number formatting system while you complete the questionnaire.

To temporarily change your computer's number settings to U.S. settings, please do the following (for Microsoft Windows Operating system):

- START
- Control Panel
- Region and Language (under Clock, Language, and Region category)
- Format tab
- Change the Format from your existing one (e.g., "Italian (Italy)") to "English (United States)" (see screen shots below)

When you do this the number "twelve million dollars and thirty five cents" would change from \$12.000.000,35 (Italy format) to \$12,000,000.35 (U.S. format), and then there will be no conflict with the USITC foreign producer questionnaire form. When you finish reporting the data then you can close the questionnaire and switch back to your country settings.



HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

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

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

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

• **Upload via 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 did not produce or export 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.