

Exporter Question naire

Product: POWER TR \NSFORMERS

From: China, Indonesia, Korea, Taiwan, Thailand and Vietnam

Period of Investigation: 1 July 2010 - 30 June 2013

Response due by: 9 leptember 2013 (extended to 7 October 2013)

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Anti- Dumping Commission website: www.adcommission.gov.a i

Return completed Anti-Dumping Commission

questionnaire to: Customs House

5 Constitution Avenue Canberra ACT 2600

Attention: Director Operations 1

Fortune Electric Co., Ltd

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SECTION A COMPANY STRUCTURE AND OPERATIONS

This section requests information relating to company details and financial reports.

A-1 Identity and communication

Please nominate a person within your company who can be contacted for the purposes of this investigation:

Response:

Fortune Electric Co., Ltd. (hereinafter called "Fortune").

Office: 10F, No 370, Section 1,

Fu Xing South. Road, Taipei, 106, Taiwan

Contact Person: Rafe Ho,

Project Manager, Export Section 2, International

Department

Telephone: +886-2- 2704-7001 Ext 238

Facsimile number: +886-2-2704-7005

E-mail: rafe@fortune.com.tw

A-2 Representative of the company for the purpose of investigation

If you wish to appoint a representative to assist you in this investigation, provide the following details:

Response:

Name: Troy Morrow

Mobile Business Consultants

Address: PO Box 3291, NERANG QLD 4211, Australia

Telephone: +61 419 782205

E-mail: troy@lentro.com.au

Note that in nominating a representative, the Commission will assume that confidential material relating to your company in this investigation may be freely released to, or discussed with, that representative.

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A-3 Company information

1. What is the legal name of your business? What kind of entity is it (eg. company, partnership, sole trader)? Please provide details of any other business names that you use to export and/or sell goods.

Response:

Company

Fortune Electric Co. Ltd, (hereinafter called "Fortune").

2. Who are the owners and/or principal shareholders? Provide details of shareholding percentages for joint owners and/or principal shareholders. (List all shareholders able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company).

Response:

As at the end of Period of Investigation (POI), 6/30/2013, [confidential shareholder information]



3. If your company is a subsidiary of another company, list the principal shareholders of that company.

Response:

This question is not applicable since Fortune is not a subsidiary of another company.

4. If your parent company is a subsidiary of another company, list the principal shareholders of that company.

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This question is not applicable since Fortune is not a subsidiary of another company.

5.	Provide a diagram showing all associated or affiliated companies and your company's place within that corporate structure. *Response:*
	Please refer to Confidential Attachment A-3-5 for Fortune's Worldwide Organizational Chart.

6. Are any management fees/corporate allocations charged to your company by your parent or related company?

[confidential information regarding related entities]

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This question is not applicable since the parent or related company does not charge any management fees/corporate allocations.

7. Describe the nature of your company's business. Explain whether you are a producer or manufacturer, distributor, trading company, etc.

Response:

Fortune is a fully-integrated transformer manufacturers of high quality power equipment.

- 8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:
 - produce or manufacture
 - sell in the domestic market
 - export to Australia, and
 - export to countries other than Australia.

Response:

Fortune performs all of above functions.

9. Provide your company's internal organisation chart. Describe the functions performed by each group within the organisation.

Response:

Please refer to Confidential Attachment A-3-9 for Fortune's internal organisation chart.

10. Provide a copy of your most recent annual report together with any relevant brochures or pamphlets on your business activities.

Response:

Please refer to Confidential Attachment A-3-10 (a) for Fortune's 2012 Annual Report and Attachment A-3-10 (b) for Fortune's Brochures.

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A-4 General accounting/administration information

1. Indicate your accounting period.

Response:

Fortune's accounting period is from January 1 to December 31.

2. Indicate the address where the company's financial records are held.

Response:

Fortune's records are held in Taipei office (Address: 10 Floor, Fu Xing South Road, Taipei, Taiwan) for sales and financial accounting data. And Chung Li Headquarter (Address: No 10, Chi Lin Road, Tao Yuan County Chung Li City, Chung Industry Zone, Taiwan) for production records and cost accounting data.

Please note Fortune's MIS computer system can retrieves any data at any location.

- 3. Please provide the following financial documents for the two most recently completed financial years plus all subsequent monthly, quarterly or half yearly statements:
 - chart of accounts:
 - audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);
 - internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods under consideration.

These documents should relate to:

- the division or section/s of your business responsible for the production and sale of the goods under consideration, and
- the company

Response:

Please refer to Confidential Attachment A-4-3 (a) for chart of accounts.

Please refer to Confidential Attachment A-4-3 (b) and (c) for audited consolidated financial statements for 2011 and 2012 respectively.

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Please refer to Confidential Attachment A-4-3 (d) and (e) for audited unconsolidated financial statement for 2011 and 2012 respectively.

Please refer to Confidential Attachment A-4-3 (f) for audited consolidated financial statement for the first half of 2013.

Fortune does not keep an internal financial statement, income statement specifically for the goods under consideration in its normal course of business.

Fortune keeps detailed computerized general ledger and costing systems which can produce periodic management reports including trial balance.

4. If you are not required to have the accounts audited, provide the unaudited financial statements for the two most recently completed financial years, together with your taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

Response:

This question is not applicable since Fortune's account has been audited.

5. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If so, provide details.

Response:

Prior to 2013. Fortune's accounting practices are in accordance with GAAP.

Since 2013 Fortune's accounting practices are in accordance with IFRS.

6. Describe:

The significant accounting policies that govern your system of accounting, in particular:

 the method of valuation for raw material, work-in-process, and finished goods inventories (eg last in first out –LIFO, first in first out- FIFO, weighted average);

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Fortune's raw materials, work-in-process and finished goods inventories are valued at weighted average method. For semifinished goods, the inventory value will be the sum of actual cost of job orders.

 costing methods, including the method (eg by tonnes, units, revenue, direct costs etc) of allocating costs shared with other goods or processes (such as front office cost, infrastructure cost etc);

Response:

Majority of Fortune's raw materials are valued by weights or units. There is no infrastructure cost allocation since we are adopting job order cost accounting system.

 valuation methods for damaged or sub-standard goods generated at the various stages of production;

Response:

There is no damaged or sub-standard goods generated at the various stages of production.

valuation methods for scrap, by products, or joint products;

Response:

Fortune disposed scrap as scrap sales booked as a reduction of cost of goods sold. There is no by products or joint products.

valuation and revaluation methods for fixed assets;

Response:

Fixed assets are depreciated at straight line method. There is no revaluation during the period of investigation.

 average useful life for each class of production equipment and depreciation method and rate used for each;

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Response:

Depreciation for:

Buildings and facilities: 3 to 55 years,

Production Equipments: 2 to 15 years

Solar Panel Equipments: 10 to 12 years

Other Equipments: 3 to 10 years

treatment of foreign exchange gains and losses arising from transactions;

Response:

Foreign currency exchange gains and losses are calculated by the spot exchange rates between foreign currencies and New Taiwan Dollars (NTD) on the date of transactions.

 treatment of foreign exchange gains/losses arising from the translation of balance sheet items;

Response:

Balance sheet items foreign currencies gains and losses are valued at an adjusted spot exchange rates between foreign currencies and NTD on the date of balance sheet.

inclusion of general expenses and/or interest;

Response:

General expenses are recorded as part of income statement. Interest income/expenses are recorded as a separate item in the income statement.

provisions for bad or doubtful debts;

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In accordance with IFRS, Fortune will evaluate its customers on the basis of:

- 1. Apparently facing a financial crisis problem, or
- 2. Overdue of accounts receivable, or
- 3. Any bankruptcy or re-organization signals on debtors
- expenses for idle equipment and/or plant shut-downs;

Response:

There is no idle equipment and/or plant shut-down during the period of investigation.

costs of plant closure;

Response:

There is no plant closure incurred during the period of investigation.

restructuring costs;

Response:

This question is not applicable since there is no restructuring costs incurred.

- by-products and scrap materials resulting from your company's production process; and

Response:

There is no by-products to Fortune.

Scrap materials such as silicon steel, copper wire and insulation materials are incurred during the stacking and winding production process.

effects of inflation on financial statement information.

Response:

This question is not applicable during the period of investigation.

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7. In the event that any of the accounting methods used by your company have changed over the last two years provide an explanation of the changes, the date of change, and the reasons for it.

Response:

Taiwan Government adopts IFRS (changed from GAAP) since 2013.

There is no other change during the last two years.

A-5 Income statement

Please fill in the following table. It requires information concerning all products produced and for the goods under consideration ('goods under consideration' (the goods) is defined in the Glossary of Terms in the appendix to this form). You should explain how costs have been allocated.

	Most recent completed financial year (2012)		Investigation period 2010/7/1 to 2013/6/30	
	All products	Goods Under Consideration	All products	Goods Under Consideration
Gross Sales (1)				
Sales returns, rebates and discounts (2)				
Net Sales (3=1-2)				
Raw materials (4)				
Direct Labour (5)				
Depreciation (6)				
Manufacturing overheads (7)				
Other operating expenses (8)				
Total cost to make (9=4+5+6+7+8)				
OPERATING INCOME (10=3-9)				
Selling expenses (11)				
Administrative & general expenses (12)				
Financial expenses (13)				

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SG&A expenses		
(14)=(11+12=13)		
INCOME FROM NORMAL ACTIVITIES (15)=(10-14)		
Interest income (16)		
Interest expense (enter as negative) (17)		
Extraordinary gains and Losses – enter losses as negative (18)		
Abnormal gains and losses – enter losses as negative (19)		
PROFIT BEFORE TAX (20)=(15+16+17+18+19)		
Tax (21)		
NET PROFIT (22)=(20-21)		
Nata : if fin a i al infa	 	

Note: if your financial information does not permit you to present information in accordance with this table please present the information in a form that closely matches the table.

Prepare this information on a spreadsheet named "Income Statement".

This information will be used to verify the completeness of cost data that you provide in Section G. If, because of your company's structure, the allocations would not be helpful in this process, please explain why this is the case.

Response:

Please refer to Confidential Attachment A-5.

[confidential costing information]

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A-6 Sales

State your company's net turnover (after returns and all discounts), and free of duties and taxes. Use the currency in which your accounts are kept, in the following format:

	Most recent completed financial year (specify)		Investigation	period
	Volume	Value	Volume	Value
Total company turnover				
(all products)				
Domestic market				
Exports to Australia				
Exports to Other Countries				
Turnover of the nearest business unit, for which financial statements are prepared, which includes the goods under consideration				
Domestic market				
Exports to Australia				
Exports to Other Countries				
Turnover of the goods under consideration				
Domestic market				
Exports to Australia				
Exports to Other Countries				

Prepare this information in a spreadsheet named "TURNOVER".

This information will be used to verify the cost allocations to the goods under consideration in Section G.

Also, you should be prepared to demonstrate that sales data shown for the goods is a complete record by linking total sales of these goods to relevant financial statements.

Response:

Please refer to Confidential Attachment A-6.

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SECTION B SALES TO AUSTRALIA (EXPORT PRICE)

This section requests information concerning your export practices and prices to Australia. You should include costs incurred beyond ex-factory. Export prices are usually assessed at FOB point, but the Commission may also compare prices at the ex factory level.

You should provide details of all goods under consideration (the goods):

- invoiced during the investigation period; and
- subject to tenders that were won during the investigation period, even in circumstances where the goods were not invoiced or **shipped** to Australia during the investigation period. In this circumstance, please provide details of any expenses already incurred with respect to the goods shipped outside of the investigation period,

For tender sales, the Commission considers the contract date will normally be taken to be the date of sale. To ensure that the Commission can make a proper assessment of date of sale, we request the contract date, invoice date and delivery date. If you consider that a date other than the contract date is the appropriate date of sale, please provide a response outlining your reasons for this.

B-1 For each customer in Australia to whom you shipped goods in the investigation period list:

name:

address:

contact name and phone/fax number where known; and trade level (for example: distributor, wholesaler, retailer, end user, original equipment).

Response:

Please refer to Confidential Attachment B-1.

- **B-2** For each customer identified in B1 please provide the following information.
 - (a) Describe how the goods are sent to each customer in Australia, including a diagram if required.

Response:

Please refer to Confidential Attachments B-2 (a) and B-2(e).

Please note Fortune has a liaison office registered (A.B.N 50 102 833 081) at Level 7, 60 York Street, Sydney NSW 2000, Australia. The sales patterns are the same in the Australian markets.

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(b) Identify each party in the distribution chain and describe the functions performed by them. Where commissions are paid indicate whether it is a pre or post exportation expense having regard to the date of sale.

Response:

Please refer to Confidential Attachments B-2 (a) and B-2(e).

[confidential commission arrangements]

(c) Explain who retains ownership of the goods at each stage of the distribution chain. In the case of DDP sales, explain who retains ownership when the goods enter Australia.

Response:

of Fortunes' sales are conducting by DDP sales. The balance are FCA sales terms.

For DDP sales, Fortune retained the ownership until delivered to site.

Fortune retained the ownership as ex-work basis in FCA sales term.

(d) Describe any agency or distributor agreements or other contracts entered into in relation to the Australian market (supply copy of the agreement if possible).

Response:



[confidential agency arrangements]

Please refer to Confidential Attachment B-2 (d) for sales representative agreement.

(e) Explain in detail the process by which you negotiate price, receive orders, deliver, invoice and receive payment. If export prices are determined through a tender process, supply copies of winning tender bids.

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Please refer to Confidential Attachment B-2(e) for a winning tender bids.

(f) State whether your firm is related to any of its Australian customers. Give details of any financial or other arrangements (eg free goods, rebates, or promotional subsidies) with the customers in Australia (including parties representing either your firm or the customers).

Response:

Fortune is not related to any of its Australian customers. Therefore this question is not applicable.

(g) Details of the forward orders of the goods under consideration (include quantities, values and scheduled shipping dates).

Response:

Forward orders of the goods under consideration have been included in Confidential Attachment B-4.

B-3 Do your export selling prices vary according to the distribution channel identified? If so, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Response:

There is no selling prices variation according to the distribution channel as described above, since all Fortune's customers are end users.

B-4 Prepare a spreadsheet named "Australian sales" listing all shipments (i.e. transaction by transaction) to Australia of the goods under consideration in the investigation period.

Where a contract has been won during the investigation period but the goods are not yet shipped, provide details of these goods with any expenses incurred to date and the scheduled delivery date specified in the contract.

You must provide this list in electronic format. Include the following export related information:

Column heading	Explanation
Customer name	names of your customers
Level of trade	the level of trade of your customers in Australia

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Model/product	code used in your records for the model/grade/type identified. Explain
code	the product codes in your submission.
Power rating (MVA)	Where more than one unit of the goods is shipped and the power rating differs between units, please list these units separately.
Voltage ratio (kV)	Where more than one unit of the goods is shipped and the voltage ratio differs between units, please list these units separately.
Contract number	Show order confirmation, contract or purchase order number
Contract date	Date contract was agreed with Australian customer – ensure all contracts entered in to during the investigation period are included, regardless of whether the goods were invoiced or delivered to your Australian customers outside of the investigation period
Invoice number	invoice number
Invoice date	Invoice date - ensure details of all invoiced goods during the investigation period are included, regardless of whether the contract was agreed or the goods were shipped outside of the investigation period.
Delivery date	if the delivery date differs from the invoice date please specify. If delivery has not occurred, include the scheduled delivery date set out in the contract for sale.
Shipping terms	Delivery terms eg. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	agreed payment terms eg. 60 days=60 etc
Quantity	Quantity in units shown on the invoice.
Gross invoice value	gross invoice value shown on invoice in the currency of sale, excluding taxes.
Discounts on the	if applicable, the amount of any discount deducted on the invoice on
invoice	each transaction. If a % discount applies show that % discount applying in another column.
Other charges	any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide a description.
Invoice currency	the currency used on the invoice
Exchange rate	Indicate the exchange rate used to convert the currency of the sale to the currency used in your accounting system
Net invoice value in the currency of the exporting country	the net invoice value expressed in your domestic currency as it is entered in your accounting system
Rebates or other allowances	the amount of any deferred rebates or allowances paid to the importer in the currency of sale
Other discounts	the actual amount of any other discount not deducted from the invoice. Show a separate column for each type of discount.
Ocean freight**	the actual amount of ocean freight incurred on each export shipment listed. If the goods are not yet shipped, provide an estimate of ocean freight.
Marine insurance	Amount of marine insurance. If the goods are not yet shipped, provide an estimate of marine insurance.
FOB export price**	the free on board price at the port of shipment.
Packing*	Packing expenses
Inland transportation costs*	inland transportation costs included in the selling price. For export sales this is the inland freight from factory to port in the country of export. If the goods are not yet shipped, provide an estimate of inland freight.
Handling, loading & ancillary expenses*	handling, loading & ancillary expenses. For example, terminal handling, export inspection, wharfage & other port charges, container tax, document fees & customs brokers fees, clearance fees, bank charges, letter of credit fees, & other ancillary charges incurred in the exporting country.
Warranty & guarantee	warranty & guarantee expenses

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expenses*	
Installation	Any expense associated with the installation of the goods if included in
expenses	the contract
Technical assistance & other services*	expenses for after sale services, such as technical assistance or installation costs.
Commissions*	Commissions paid. If more than one type is paid insert additional columns of data. Indicate in your response to question B2 whether the commission is a pre or post exportation expense having regard to the date of sale.
Other factors*	any other costs, charges or expenses incurred in relation to the exports to Australia (include additional columns as required). See question B5.

^{**} FOB export price and Ocean Freight:

<u>FOB export price</u>: An FOB export price must be calculated for each shipment - regardless of the shipping terms. FOB price includes inland transportation to the port of exportation, inland insurance, handling, and loading charges. It excludes post exportation expenses such as ocean freight and insurance. Use a formula to show the method of the calculation on each line of the export sales spreadsheet.

<u>Ocean freight:</u> as ocean freight is a significant cost it is important that the <u>actual</u> amount of ocean freight incurred on each exportation be reported. If estimates must be made you must explain the reasons and set out the basis - estimates must reflect changes in freight rates over the investigation period.

Freight allocations must be checked for consistency.

Response:

Please refer to Confidential Attachment B-4 for Australian sales listing.

The reported FOB export price were calculated for each shipment. It includes inland transportation to the port of exportation, inland insurance, handling and loading charges. It excludes post exportation expenses such as ocean freight and insurance.

B-5 If there are any other costs, charges or expenses incurred in respect of the exports listed above which have not been identified in the table above, add a column (see "other factors" in question B-4) for each item, and provide a description of each item. For example, other selling expenses (direct or indirect) incurred in relation to the export sales to Australia.

Response:

Fortune has reported the following columns in the sales listing:

- 1. FOB export price in Taiwan: based on Taiwan export declaration form.
- 2. "Inland transport in Australian (1)" and "Inland transport in Taiwan (2)":

^{*} All of these costs are further explained in section E-1.

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Indicating the inland freights incurred in Taiwan and Australian respectively.

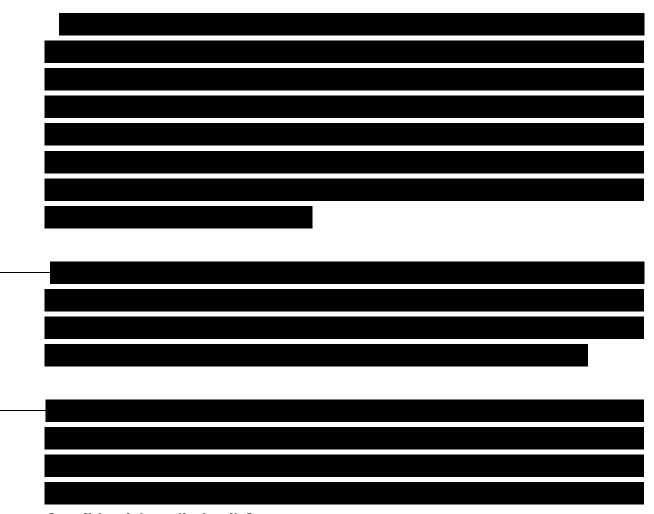
- 3. "Handling & others in Australian (1)" and "Handling & others in Taiwan (2)": indicating the handling & others incurred in Taiwan and Australian markets respectively.
- **B-6** For each type of discount, rebate, allowance offered on export sales to Australia:
 - provide a description; and

Response:

- explain the terms and conditions that must be met by the importer to obtain the discount.

Where the amounts of these discounts, rebates etc are not identified on the sales invoice, explain how you calculated the amount shown in your response to question B4. If they vary by customer or level provide an explanation.

	[confidential discount details]
B-7	If you have issued credit notes (directly or indirectly) to the customers in Australia, in relation to the invoices listed in the detailed transaction by transaction listing in response to question B4, provide details of each credit note if the credited amount has not been reported as a discount or rebate.
	Response:



[confidential credit details]

B-8 If the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (eg. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred. For example:

Import duties	Amount of import duty paid in Australia
Inland	Amount of inland transportation expenses within Australia
transport	included in the selling price
Other costs	Customs brokers, port and other costs incurred (itemise)

Response:

Fortune has reported the import duties, inland transport and other costs in Confidential Attachment B-4.

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- **B-9** For two contracts where the goods were also shipped to Australia during the investigation period, please provide a complete set of all documentation related to the export sale. For example:
 - the contract between your company and your Australian customer;
 - the commercial invoice;
 - bill of lading, export permit;
 - freight invoices in relation to movement of the goods from factory to Australia, including inland freight contract;
 - marine insurance expenses; and
 - letter of credit, and bank documentation, proving payment.

The Commission will select additional shipments for payment verification at the time of the visit.

Response:

Please refer to Confidential Attachment B-9 (a) and B-9 (b) for two transaction samples.

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SECTION C EXPORTED GOODS & LIKE GOODS

C-1 Fully describe all of the goods you have exported to Australia during the investigation period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the exported goods.

Response:

Please refer to Confidential Attachment C-1.

C-2 List each unique unit of goods exported to Australia (these types should cover all types listed in spreadsheet "**Australian sales**" – see section B of this questionnaire).

EXPORT TYPE	Mega volt amperes (MVA)	Kilo volts (kV)
Product code of each unique unit of the goods exported to Australia		

Response:

Please refer to Confidential Attachment C-2.

C-3 List each unique unit of power transformer sold on the domestic market during the investigation period.

DOMESTIC TYPE	Mega volt amperes (MVA)	Kilo volts (kV)
Product code of each unique unit of the goods sold domestically		

Response:

Please refer to Confidential Attachment C-3.

C-4 Please provide any technical and illustrative material that may be helpful in identifying or classifying the goods that your company sells on the domestic market.

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Please refer to Attachment C-4.

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SECTION D DOMESTIC SALES

This section seeks information about the sales arrangements and prices in the domestic market of the country of export.

The Commission's preliminary view of normal value:

The Commission considers that it may not be appropriate to determine normal values in accordance with section 269TAC(1) of the Act, using your domestic sales as adjusted for proper comparison with export sales, as the goods under consideration are capital goods that are manufactured to order.

The Commission seeks information on your domestic sales for the purpose of determining profit so that a normal value can be properly constructed pursuant to section 269TAC (2)(c), using your cost to make and sell plus amounts for selling, general and administrative expenses and profit. If you consider that this is appropriate, **you do not need to complete Section E (fair comparison) of this questionnaire**.

If you consider that it is appropriate for the Commission to determine normal values pursuant to section 269TAC (1) of the Act, please ensure you complete Section D, Section E and Section F of this questionnaire.

Information requested in relation to domestic sales:

In Section B, the Commission requests information in relation to your export sales to Australia. The Commission requested the following:

- details of all invoiced sales made during the investigation period; and
- details of all tenders won during the investigation, regardless of whether the goods were invoiced and delivered outside of the investigation period. In these circumstances, the Commission requested that you provide an estimate of when the goods will be delivered to your Australian customers.

In relation to domestic sales, the Commission requests that you provide details of ALL of your invoiced sales during the investigation period. You **do not need** to provide details of tenders that were won during the investigation period but invoiced outside of the investigation period.

If there is an extraordinarily large volume of sales data and you are unable to provide the complete listing electronically you **must** contact the case officer **before** completing the questionnaire. If the case officer agrees that it is not possible to obtain a complete listing he or she will consider a method for sampling that meets the Commission requirements. If agreement cannot be reached as to the appropriate method the Commission may not visit your company.

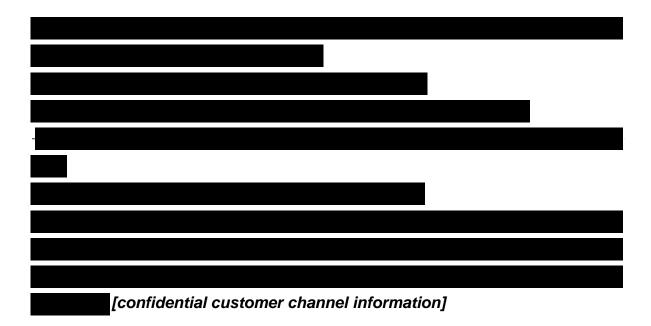
If you do not have any domestic sales of like goods you must contact the case officer who will explain the information the Commission requires for determining a normal value using alternative methods.

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D-1 Provide:

- a detailed description of your distribution channels to domestic customers, including a diagram if appropriate;

Response:



Please refer to Confidential Attachment D-1 (a) for sales flowchart.

- information concerning the functions/activities performed by each party in the distribution chain; and

Response:

Please refer to Confidential Attachment D-1 (b) for an activities chart.

- a copy of any agency or distributor agreements, or contracts entered into.

Response:

Please refer to Confidential Attachment D-1(c) for a sample contract.

If any of the customers listed are associated with your business, provide details of that association. Describe the effect, if any, that association has upon the price.

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There is no affiliated customers in the domestic market.

D-2 Do your domestic selling prices vary according to the distribution channel identified? If so, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Response:

Since most of contracts are public bid on tender offers. There is no price distinction between distribution channel.

[confidential trade level detail]

- **D-3** Explain in detail the sales process, including:
 - the way in which you set the price, receive orders, make delivery, invoice and finally receive payment; and the terms of the sales; and

Response:

Please refer to Confidential Attachment D-1(a).

whether price includes the cost of delivery to customer.

Response:

Most of the contracted prices include the cost of delivery to customers. Just in very few occasions customers are decided to pick up the goods by themselves.

If sales are in accordance with price lists, provide copies of the price lists.

Response:

This question is not applicable. There is no price lists in the domestic sales market.

D-4 Prepare a spreadsheet named "domestic sales" listing all sales of like goods made during the investigation period. The listing must be provided on a CD-ROM. Include all of the following information.

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Column heading	Explanation
Customer name	names of your customers. If an English version of the name is not easily
	produced from your automated systems show a customer code number
	and in a separate table list each code and name.
Level of trade	the level of trade of your domestic customer
Product code	code used in your records for the model of the goods identified. Explain
	the product codes in your submission.
Power rating (MVA)	Where more than one unit of the goods is shipped and the power rating
	differs between units, please list these units separately.
Voltage ratio (kV)	Where more than one unit of the goods is shipped and the voltage ratio
	differs between units, please list these units separately.
Contract number	Show order confirmation, contract or purchase order number
Contract date	Date contract was agreed with your domestic customer. Do not include
	information relating to contracts where the goods were invoiced outside
	of the investigation period.
Invoice number	invoice number
Invoice date	invoice date
Delivery date	If the delivery date is different to the invoice date please specify
Delivery terms	eg ex factory, free on truck, delivered into store
Payment terms	payment terms agreed with the customer eg. 60 days=60 etc
Quantity	quantity in units shown on the invoice eg kg.
Gross Invoice value	gross value shown on invoice in the currency of sale, net of taxes.
Discounts on the	the amount of any discount deducted on the invoice on each
Invoice	transaction. If a % discount applies show that % discount applying in
	another column.
Other charges	any other charges, or price reductions, that affect the net invoice value.
	Insert additional columns and provide description.
Net invoice value in	the net invoice value expressed in your domestic currency as recorded in
the currency of the	your accounting system
exporting country	the set above of the state of the second state
Rebates or other	the actual amount of any deferred rebates or allowances in the currency
Allowances	of sale the actual amount of quantity discounts not deducted from the invoice.
Quantity discounts	Show a separate column for each type of quantity discount.
Packing*	packing expenses
Inland transportation	amount of inland transportation costs included in the selling price.
Costs*	amount of infanti transportation costs included in the selling price.
Handling, loading	handling, loading & ancillary expenses.
And ancillary	Tranding, loading & anomary expenses.
Expenses*	
Warranty &	warranty & guarantee expenses
Guarantee expenses*	
Installation expenses	Any expense associated with the installation of the goods if included in
motanianom expenses	the contract
Technical assistance	expenses for after sale services such as technical assistance or
& other services*	installation costs.
Commissions*	commissions paid. If more than one type is paid insert additional
	columns of data.
Other factors*	any other costs, charges or expenses incurred in relation to the
	domestic sales (include additional columns as required). See question
	D5.

Costs marked with * are explained in section E-2.

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Response:

Please refer to Confidential Attachment D-4.

D-5 If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-4 above add a column for each item (see "other factors"). For example, certain other selling expenses incurred.

Response:

Please refer to Confidential Attachment D-4. Fortune have reported all costs, charges or expenses in respect of the sales listed in Question D-4.

- **D-6** For each type of commission, discount, rebate, allowance offered on domestic sales of like goods:
 - provide a description; and
 - explain the terms and conditions that must be met by the customer to qualify for payment.

[confidential commission
[comacnum commission
information1

Where the amounts of these discounts, rebates etc are not identified on the sales invoice, explain how you calculated the amounts shown in your response to question D4.

Response:



If you have issued credit notes, directly or indirectly to the customers, provide details if the credited amount has **not** been reported as a discount or rebate.

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Response:

[confidential

credit note information]

D-7 Select two domestic sales that are at the same level of trade as the export sales. Provide a <u>complete</u> set of documentation for those two sales. (Include, for example, the tender bid, the contract of sale, commercial invoice, discounts or rebates applicable, credit/debit notes, inland freight contract, bank documentation showing proof of payment.)

The Commission will select additional sales for verification at the time of our visit.

Response:

Please refer to Confidential Attachment D-7 for two domestic sales samples.

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SECTION E FAIR COMPARISON

As outlined in Section D, please complete Section E only if you would submit that the Commission should determine normal values pursuant to section 269TAC (1).

Section B sought information about the export prices to Australia and Section D sought information about prices on your domestic market for like goods (ie. the normal value).

Where the normal value and the export price are not comparable adjustments may be made. This section informs you of the fair comparison principle and asks you to quantify the amount of any adjustment.

As prices are being compared, the purpose of the adjustments is to eliminate factors that have unequally modified the prices to be compared.

To be able to quantify the level of any adjustment it will usually be necessary to examine cost differences between sales in different markets. The Commission must be satisfied that those costs are likely to have influenced price. In practice, this means that the expense item for which an adjustment is claimed should have a close nexus to the sale. For example, the cost is incurred because of the sale, or because the cost is related to the sale terms and conditions.

Conversely, where there is not a direct relationship between the expense item and the sale a greater burden is placed upon the claimant to demonstrate that prices have been affected, or are likely to have been affected, by the expense item. In the absence of such evidence the Commission may disallow the adjustment.

Where possible, the adjustment should be based upon actual costs incurred when making the relevant sales. However, if such specific expense information is unavailable cost allocations may be considered. In this case, the party making the adjustment claim must demonstrate that the allocation method reasonably estimates costs incurred.

A party seeking an adjustment has the obligation to substantiate the claim by relevant evidence that would allow a full analysis of the circumstances, and the accounting data, relating to the claim.

The investigation must be completed within strict time limits therefore you must supply information concerning claims for adjustments in a timely manner. Where an exporter has knowledge of the material substantiating an adjustment claim that material is to be available at the time of the verification visit. The Commission will not consider new claims made after the verification visit.

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E-1 Costs associated with export sales

(These cost adjustments will relate to your responses made at question B-4, 'Australian sales')

1. Transportation

Explain how you have quantified the amount of inland transportation associated with the export sale ("Inland transportation costs"). Identify the general ledger account where the expense is located. If the amount has been determined from contractual arrangements, not from an account item, provide details and evidence of payment.

Response:

Fortune report the inland transportation incurred in Taiwan (from factory to port) and in Australia (from port to designated location).

The inland freights are charged by trucking company on job order basis thus there is no allocation necessary.



Fortune also reported the "ocean freight" and "ocean insurance" expenses in the sales listing for Australian sales term of "DDP".

[confidential customer information]

2. Handling, loading and ancillary expenses

List all charges that are included in the export price and explain how they have been quantified ("Handling, loading & ancillary expenses"). Identify the general ledger account where the expenses are located. If the amounts have been determined using actual observations, not from a relevant account item, provide details.

The various export related ancillary costs are identified in the table at question B4, for example:

- terminal handling;
- wharfage and other port charges;
- container taxes;
- document fees and customs brokers fees;
- clearance fees;
- bank charges, letter of credit fees
- other ancillary charges.

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Fortune reported "Handling & Others" incurred in Taiwan and Australia markets respectively.

The reported "Handling & Others" included customer brokerage, wharfage and other broker fees, unloading fees, handling charges etc.

3. Credit

The cost of extending credit on export sales is not included in the amounts quantified at question B4. However, the Commission will examine whether a credit adjustment is warranted and determine the amount. Provide applicable interest rates over each month of the investigation period. Explain the nature of the interest rates most applicable to these export sales eg, short term borrowing in the currency concerned.

If your accounts receivable shows that the average number of collection days differs from the payment terms shown in the sales listing, *and if* export prices are influenced by this longer or shorter period, calculate the average number of collection days. See also item 4 in section E-2 below.

Fortune report the credit cost by the following formula,					
[confidential credit	t cost calculation information]				

4. Packing costs

Response:

List material and labour costs associated with packing the export product. Describe how the packing method differs from sales on the domestic market, for each model. Report the amount in the listing in the column headed '**Packing**'.

Response:	
	1
[confidential packing cost information]	

5. Commissions

For any commissions paid in relation to the export sales to Australia:

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- provide a description; and
- explain the terms and conditions that must be met.

Report the amount in the sales listing in question B-4 under the column headed "Commissions". Identify the general ledger account where the expense is located.

Response:
[confidential commission calculation information]
Warranties, guarantees, installation and after sales services List the costs incurred. Show relevant sales contracts. Show how you calculated the expenses ("Warranty & guarantee expenses", "Installation expenses" and "Technical assistance & other services"), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for the service, repair, or consultation. Where these expenses are included in the contract for sale or closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.
Response:
[confidential
warranty and installation information]

7. Other factors

6.

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There may be other factors for which an adjustment is required if the costs affect price comparability – these are identified in the column headed "Other factors". For example, other variable or fixed selling expenses, including salesmen's salaries, salesmen's travel expenses, advertising and promotion, samples and entertainment expenses. Your consideration of questions asked at Section G, concerning domestic and export costs, would have alerted you to such other factors.

Response:

Fortune has reported all factors in the sales listings.

8. Currency conversions

In comparing export and domestic prices a currency conversion is required. Fluctuations in exchange rates can only be taken into account when there has been a 'sustained' movement during the period of investigation (see article 2.4.1 of the WTO Agreement). The purpose is to allow exporters 60 days to adjust export prices to reflect 'sustained' movements. Such a claim requires detailed information on exchange movements in your country over a long period that includes the investigation period.

Response:

There is no currency conversion adjustment necessary.

E-2 Costs associated with domestic sales

(These cost adjustments will relate to your responses made at question D-4, "domestic sales")

The following items are not separately identified in the amounts quantified at question D-4. However you should consider whether any are applicable.

1. Physical characteristics

This adjustment recognises that differences, such as structure or design, mean that the goods are not identical. The Commission considers that the goods are unlikely to have identical models sold on the domestic market as they are large capital goods that are produced to order.

To support your claim that the Commission should determine normal values pursuant to section 269TAC (1), you will need to identify and quantify the physical or specification differences in order to ensure fair comparison.

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The amount of the adjustment shall be based upon the market value of the difference, but where this is not possible the adjustment shall be based upon the difference in cost plus the gross profit mark-up (i.e. an amount for selling general and administrative costs (S G & A) plus profit).

The adjustment is based upon actual physical differences in the goods being compared and upon the manufacturing cost data.

Using the table below, provide a list of the claimed comparable product sold on the domestic market. Describe in detail the specification differences between the comparable products. Also provide your claimed adjustment on the basis of this specification difference, stating the source of your data.

The Commission will seek to verify your claimed specification adjustments during the verification visit.

EXPORTED TYPE	DOMESTIC TYPE	DIFFERENCES	CLAIMED ADJUSTMENT
Product code,	Product code,	Describe the	The claimed adjustment
power rating and	power rating and	specification	must be quantifiable and
voltage ratio of	voltage ratio of	differences in detail. If	supported by evidence
each model of the	comparable model	it is impractical to detail	that is available for
goods exported to	sold on the	specification	verification by the
Australia	domestic market	differences in this table	Commission
	of the country of	refer to documents	
	export	which outline	
		differences	

Response:

Please refer to Confidential Attachment E-2.1 for the physical characteristics similarity comparison table.

Fortune believes its selected domestic sales models are similar to the Australian sales models, after minor adjustment, if necessary.

Fortune expects the ADC may take into consideration the appropriateness of choosing the suggested domestic sales models as normal value while calculating the dumping margin.



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-		
-		

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2. Import charges and indirect taxes

If exports to Australia:

- are partially or fully exempt from internal taxes and duties that are borne by the like goods in domestic sales (or on the materials and components physically incorporated in the goods), or
- if such internal taxes and duties have been paid and are later remitted upon exportation to Australia;

the price of like goods must be adjusted downwards by the amount of the taxes and duties.

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The taxes and duties include sales, excise, turnover, value added, franchise, stamp, transfer, border, and excise taxes. Direct taxes such as corporate income tax are not included as such taxes do not apply to the transactions.

Adjustment for drawback is not made in every situation where drawback has been received. Where an adjustment for drawback is appropriate you must provide information showing the import duty borne by the domestic sales. (That is, it is not sufficient to show the drawback amount and the export sales quantity to Australia. For example, you may calculate the duty borne on domestic sales by quantifying the total amount of import duty paid and subtracting the duty refunded on exports to all countries. The difference, when divided by the domestic sales volume, is the amount of the adjustment).

In substantiating the drawback claim the following information is required:

- a copy of the relevant statutes/regulations authorising duty exemption or remission, translated into English;
- the amount of the duties and taxes refunded upon exportation and an explanation how the amounts were calculated and apportioned to the exported goods;
- an explanation as to how you calculated the amount of duty payable on imported materials is borne by the goods sold *domestically* but is not borne by the exports to Australia;

Response:

There is duty drawback during the period of investigation.

[confidential duty drawback information]

In addition, according to Taiwan Value Added Tax (VAT) regulations, the prevailing VAT rate is 5% in the domestic sales and 0% for export sales. Since we are reporting domestic sales on net of VAT price, therefore there is no adjustment considered necessary.

Substitution drawback systems

Annex 3 of the WTO Agreement on Subsidies provides: "Drawback systems can allow for the refund or drawback of import duties on inputs which are consumed in the production process of another product and where the export of this latter product contains domestic inputs having the same quality and characteristics as those substituted for the imported inputs"

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If such a scheme operates in the country of export adjustments can also be made for the drawback payable on the substituted domestic materials, provided the total amount of the drawback does not exceed the total duty paid.

Response:

There is no such substitution drawback system in Fortune.

3. Level of trade

Question D-4 asks you to indicate the level of trade to the domestic customer. To claim an adjustment for level of trade differences you will need to quantify the amount by which level of trade influences price.

Trade level is the level a company occupies in the distribution chain. The trade level to which that company in turn sells the goods and the functions carried out distinguish a level of trade. Examples are producer, national distributor, regional distributor, wholesaler, retailer, end user, and original equipment.

It may not be possible to compare export prices and domestic prices at the same level of trade. Where relevant sales of like goods at the next level of trade must be used to determine normal values an adjustment for the difference in level of trade may be required where it is shown that the difference affects price comparability.

The information needs to establish that there are real trade level differences, not merely nominal differences. Real trade level differences are characterised by a consistent pattern of price differences between the levels and by a difference in functions performed. If there is no real trade level differences all sales are treated as being at the same level of trade.

A real difference in level of trade (may be adjusted for using either of the following methods:

(a) costs arising from different functions: the amount of the costs, expenses etc incurred by the seller in domestic sales of the like goods resulting from activities that would not be performed were the domestic sales made at the same level as that of the importer.

This requires the following information:

- a detailed description of each sales activity performed in selling to your domestic customers (for example sales personnel, travel, advertising, entertainment etc);
- the cost of carrying out these activities in respect of like goods;
- for each activity, whether your firm carries out the same activity when selling to importers in Australia;
- an explanation as to why you consider that you are entitled to a level of trade adjustment.

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or

(b) level discount: the amount of the discount granted to purchasers who are at the same level of trade as the importer in Australia. This is determined by an examination of price differences between the two levels of trade in the exporter's domestic market, for example sales of like goods by other vendors or sales of the same general category of goods by the exporter. For this method to be used it is important that a clear pattern of pricing be established for the differing trade levels. Such pattern is demonstrated by a general availability of the discounts to the level - isolated instances would not establish a pattern of availability.

Response:



[confidential level of trade information]

4. Credit

The cost of extending credit on domestic sales is not included in the amounts quantified at question D-4. However, the Commission will examine whether a credit adjustment is warranted and determine the amount. An adjustment for credit is to be made even if funds are not borrowed to finance the accounts receivable.

The interest rate on domestic sales in order of preference is:

- the rate, or average of rates, applying on actual short term borrowing's by the company; or
- the prime interest rate prevailing for commercial loans in the country for credit terms that most closely approximate the credit terms on which the sales were made; or
- such other rate considered appropriate in the circumstances.

Provide the applicable interest rate over each month of the investigation period.

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If your accounts receivable shows that the average number of collection days differs from the payment terms shown in the sales listing, and if domestic prices are influenced by this longer or shorter period, calculate the average number of collection days.

Where there is no fixed credit period agreed at the time of sale the period of credit is determined on the facts available. For example, where payment is made using an open account system¹, the average credit period may be determined as follows:

1. Calculate an accounts receivable turnover ratio

This ratio equals the total credit sales divided by average accounts receivable. (It is a measure of how many times the average receivables balance is converted into cash during the year).

In calculating the accounts receivable turnover ratio, credit sales should be used in the numerator whenever the amount is available from the financial statements. Otherwise net sales revenue may be used in the numerator.

An average accounts receivable over the year is used in the denominator. This may be calculated by:

- using opening accounts receivable at beginning of period plus closing accounts receivable at end of period divided by 2, or
- total monthly receivables divided by 12.

2. Calculate the average credit period

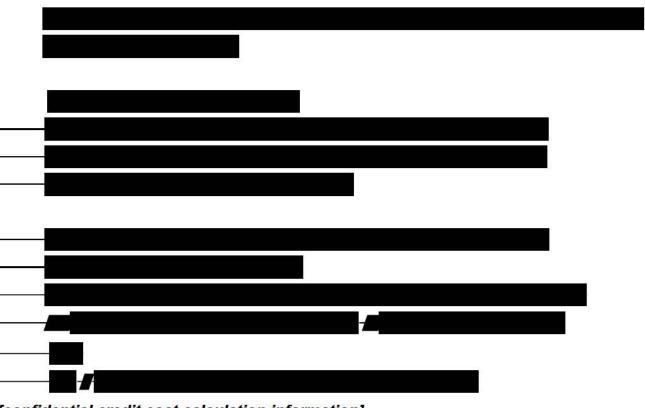
The average credit period equals 365 divided by the accounts receivable turnover ratio determined above at 1.

The resulting average credit period should be tested against randomly selected transactions to support the approximation.

Response:

Due to the unique goods under consideration characteristics and the length of the period of investigation (36 months), Fortune report the credit cost by the following formula:

¹ Under an open account system, following payment the balance of the amount owing is carried into the next period. Payment amounts may vary from one period to the next, with the result that the amount owing varies.



[confidential credit cost calculation information]

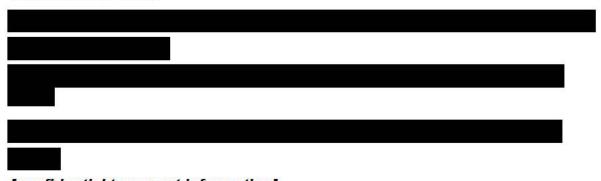
The following items are identified in the amounts quantified at question D-4:

5. Transportation

Explain how you have quantified the amount of inland transportation associated with the domestic sales ("Inland transportation Costs"). Identify the general ledger account where the expense is located. If the amount has been determined from contractual arrangements, not from an account item, provide details and evidence of payment.

Response:

Fortune report the inland transportation costs incurred in Taiwan, from factory to customers' sites.



[confidential transport information]

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6. Handling, loading and ancillary expenses

List all charges that are included in the domestic price and explain how they have been quantified ("Handling, loading and ancillary Expenses"). Identify the general ledger account where the expense is located. If the amounts have been determined using actual observations, not from a relevant account item, provide details.

Response:

There is no "Handling & Others" incurred in Taiwan market.

7. Packing

List material and labour costs associated with packing the domestically sold product. Describe how the packing method differs from sales on the domestic market, for each model. Report the amount in the listing in the column headed "**Packing**".

Response:

[confidential packing cost

information]

8. Commissions

For any commissions paid in relation to the domestic sales:

- provide a description
- explain the terms and conditions that must be met.

Report the amount in the sales listing under the column headed "**Commissions**". Identify the general ledger account where the expense is located.

Response:

[confidential commission information]

9. Warranties, guarantees, installation expenses and after sales services

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List the costs incurred. Show relevant sales contracts. Show how you calculated the expenses ("Warranty & Guarantee expenses", "Installation expenses" and "Technical assistance & other services"), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for the service, repair, or consultation. Where these expenses are included in the contract for sale or closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

Response:	
Warranties:	
	[confidential warran
information]	
Installation expense:	
	[confidential
installation information]	
Technical support:	
	[confidential technical support information]

10. Other factors

Other costs:

There may be other factors for which an adjustment is required if the costs affect price comparability – these are identified in the column headed "**Other factors**". List the factors and show how each has been quantified in per unit terms. For example:

Fortune reported the bank charges in "Other costs".

- inventory carrying cost: describe how the products are stored prior to sale and show data relating to the average length of time in inventory. Indicate the interest rate used:
- warehousing expense: an expense incurred at the distribution point;

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- royalty and patent fees: describe each payment as a result of production or sale, including the key terms of the agreement;
- advertising; and
- bad debt.

Response:

There is no other factors.

E-3 Duplication

In calculating the amount of the adjustments you must ensure that there is no duplication.

For example:

- adjustments for level of trade, quantity or other discounts may overlap, or
- calculation of the amount of the difference for level of trade may be based upon selling expenses such as salesperson's salaries, promotion expenses, commissions, and travel expenses.

Separate adjustment items must avoid duplication.

An adjustment for quantities may not be granted unless the effect on prices for quantity differences is identified and separated from the effect on prices for level of trade differences.

Response:

In order to avoid double counting, Fortune has eliminated the "allowances" reported in Australian and Domestic sales listings from the Selling Expenses in CTMS calculations.

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SECTION F EXPORT SALES TO COUNTRIES OTHER THAN AUSTRALIA (THIRD COUNTRY SALES)

Response:

Refer Confidential Attachment F.

As outlined in Section D, the Commission considers that, given the nature of the goods under consideration, it may not be appropriate to determine normal values on the basis of domestic sales (pursuant to section 269TAC(1)), or sales to third countries (pursuant to section 269TAC(2)(d)).

Please complete Section F only if you would submit that it is appropriate for the Commission to determine normal values pursuant to section 269TAC(2)(d).

Your response to this part of the questionnaire may be used by the Commission to select sales to a third country that may be suitable for comparison with exports to Australia.

Sales to third countries may be used as the basis for normal value in certain circumstances. The Commission may seek more detailed information on particular third country sales where such sales are likely to be used as the basis for determining normal value.

F-1 Using the column names and column descriptions below provide a summary of your export sales to countries other than Australia.

Column heading	Explanation
Country	Name of the country that you exported like
	goods to over the investigation period.
Number of customers	The number of different customers that your
	company has sold like goods to in the third
	country over the investigation period.
Level of trade	The level of trade that you export like goods to in
	the third country.
Quantity	Indicate the number of units sold
Value of sales	Show net sales value to all customers in third
	country over the investigation period
Currency	Currency in which you have expressed data in
	column SALES
Payment terms	Typical payment terms with customer(s) in the
	country eg. 60 days=60 etc
Shipment terms	Typical shipment terms to customers in the third
	country eg CIF, FOB, ex-factory, DDP etc.

Supply this information in spreadsheet file named "Third country"

F-2 Please identify any differences in sales to third countries which may affect their comparison to export sales to Australia.

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SECTION G COSTING INFORMATION AND CONSTRUCTED VALUE

The information that you supply in response to this section of the questionnaire will be used for various purposes including:

- testing the profitability of sales of like goods on the domestic market;
- determining a constructed normal value of the goods under consideration (the goods) ie of the goods exported to Australia; and
- making certain adjustments to the normal value.

You will need to provide the cost of production of both the exported goods (the goods) and for the like goods sold on the domestic market. You will also need to provide the selling, general, and administration costs relating to goods sold on the domestic market; the finance expenses; and any other expenses (eg. non-operating expenses not included elsewhere) associated with the goods.

In your response please include a worksheet showing how the selling, general, and administration expenses; the finance expenses; and any other expenses have been calculated.

Please provide costs associated to each of the export sales detailed at question B4 and domestic sales details in question D4.

For export sales, this will include costs associated with tenders that may be invoiced or delivered outside of the investigation period. Where these costs have not yet been incurred, please provide an estimate of these costs such as, for example, the cost you estimated at the time of bidding for the tender.

For domestic sales, you only need to include **actual** costs incurred in relation to goods invoiced during the investigation period.

At any verification meeting you must be prepared to reconcile the costs shown to the accounting records used to prepare the financial statements.

G-1. Production process and capacity

1. Describe the production process for the goods. Provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the goods. Also specify all scrap or byproducts that result from producing the goods.

Response:

Please refer to Confidential Attachment G-1 for production process.

G-2. Provide information about your company's total production in the following table:

	PREVIOUS FINANCIAL YEAR	MOST RECENT FINANCIAL YEAR	Investigation Period
A – Production capacity (eg capacity of units sold)*			
B – Actual production in volume (eg capacity of units sold)			
C – Capacity utilisation (%) (B/A x 100)			

^{*} rather than showing a 'name-plate' optimal capacity it is more meaningful to show the maximum level of production that may reasonably be attained under normal operating conditions. For example assuming: normal levels of maintenance and repair; a number of shifts and hours of operation that is not abnormally high; and a typical production mix.

Provide this information on a spreadsheet named "Production".

Response:

Please refer to Confidential Attachment G-2.

G-3. Cost accounting practices

1. Outline the management accounting system that you maintain and explain how that cost accounting information is reconciled to your audited financial statements.

Response:



[confidential accounting information]

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Is your company's cost accounting system based on standard (budgeted) costs? State whether standard costs were used in your responses to this questionnaire. If they were state whether all variances (ie differences between standard and actual production costs) have been allocated to the goods - and describe how those variances have been allocated.

Response:

Fortune's cost accounting system is based on actual costs. This question is not applicable.

3 Provide details of any significant or unusual cost variances that occurred during the investigation period.

Response:

This question is not applicable.

4 Describe the profit/cost centres in your company's cost accounting system.

Response:

There is no profit/cost centres in Fortune's cost accounting system.

For each profit/cost centre describe in detail the methods that your company normally uses to allocate costs to the goods under consideration. In particular specify how, and over what period, expenses are amortised or depreciated, and how allowances are made for capital expenditures and other development costs.

Response:

This question is not applicable.

Describe the level of product specificity (models, grades etc) that your company's cost accounting system records production costs.

Response:

Fortune's main products are power transformers.

List and explain all production costs incurred by your company which are valued differently for cost accounting purposes than for financial accounting purposes.

Response:

There is no such difference.

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State whether your company engaged in any start-up operations in relation to the goods under consideration. Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.

Response:

There is no start-up costs in relation to the goods under consideration.

9 State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation it its accounting records.

Response:

This question is not applicable.

G-4 Cost to make and sell on domestic market

This information is relevant to testing whether domestic sales are in the ordinary course of trade.²

1. Please provide (in the format shown in the table below) the actual unit cost to make and sell each model/type* (identified in section C) of the like goods sold on the domestic market. Provide this cost data for each unique unit of the goods invoiced during the investigation period.

Response:

Fortune has reported the CTMS for sales models/types to Australia and Taiwan markets.

It is normally 1 unit for the goods per invoice and per job order.

2. Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.

CUSTOMER	
Contract number	
Item number	
Quantity	
Contract date	
Delivery date	
Power rating (MVA)	

² The Commission applies the tests set out in s.269TAAD of the Customs Act 1901 to determine whether goods are in ordinary course of trade. These provisions reflect the WTO anti-dumping agreement – see Article 2.2.1.

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Voltage Ratio (kV)		
Variable manufacturing costs		
Raw material - core steel		
Raw material - conductor		
Raw material - insulation		
Raw material - mild steel		
Raw material - tapchanger		
Raw material - CT & CT terminal box		
Raw material - radiators or heat ex., fittings		
Raw material - fibre optics probes		
Raw material - fans		
Raw material - pumps		
Raw material - valves		
Raw material - control panel		
Raw material - oil		
Raw material - bushings (HV, MV, LV)		
Raw material - other		
Direct labour - Engineering (design)		
Direct labour - manufacturing (production)		
Other costs		
Fixed manufacturing costs		
Overheads		
Depreciation		
Finance charges	2	
Other costs		
Total cost to make		
Selling costs		
Administration costs		
Financial costs		
Delivery expenses		
Other costs		
Total cost to sell		
Total cost to make and sell		
Unit cost to make and sell		

Prepare this information in a spreadsheet named "Domestic CTMS".

Provide this information for each unique unit of the goods invoiced during the period of the investigation. For example, if one contract specifies production of two different types of the goods, provide this information for each type of the goods.

Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.

If you are unable to supply this information in this format, please contact the case officer for this investigation at the address shown on the cover of this questionnaire.

Response:

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Please refer to Confidential Attachment G-4 for Domestic CTMS.



Please specify unit of currency.

Response:

All reported figures are stated in NTD.

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G-5 Cost to make and sell goods under consideration (goods exported to Australia)

The information is relevant to calculating the normal values based on costs. It is also relevant to calculating certain adjustments to the normal value.

CUSTOMER	I I
Contract number	
Item number	
Quantity	
Contract date	
Delivery date	
Power rating (MVA)	
Voltage Ratio (kV)	
Variable manufacturing costs	
Raw material - core steel	
Raw material - conductor	
Raw material - insulation	
Raw material - mild steel	
The property of the state of the property of the property of the property of the state of the st	
Raw material - tapchanger Raw material - CT & CT terminal box	
Raw material - radiators or heat ex., fittings	
Raw material - fibre optics probes Raw material - fans	
Raw material - pumps	8
Raw material - valves	
Raw material - control panel	
Raw material - oil	
Raw material - bushings (HV, MV, LV)	
Raw material - other	
Direct labour – Engineering (design)	
Direct labour – Manufacturing (production)	
Other costs	
Fixed manufacturing costs	
Overheads	
Depreciation	
Finance charges	
Other costs	
Total cost to make	
Selling costs	
Administration costs	
Financial costs	
Delivery expenses	
Other costs	
Total cost to sell	
Total cost to make and sell	
Unit cost to make and sell	

Prepare this information in a spreadsheet named "Australian CTMS".

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Provide this information for all goods invoiced during the investigation period and for all goods the subject of a contract that was entered into during the investigation period, but invoiced or delivered outside of the investigation period. Where actual costs are not yet incurred, provide an estimate of these costs, such as for example, the estimate of the costs that formed the basis of your winning tender bid.

Provide this information for each unique unit of the goods contracted for sale or invoiced during the period of the investigation. For example, if one contract specifies production of two different types of the goods, provide this information for each type of the goods.

Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.

If you are unable to supply this information in this format, please contact the case officer for this investigation at the address shown on the cover of this questionnaire.

Response:

Please refer to Confidential Attachment G-5 for Australian CTMS.

Please specify unit of currency.

Response:

All reported figures are stated in NTD.

Where there are cost differences between goods sold to the domestic market and those sold for export, give reasons and supporting evidence for these differences.

Response:

Generally speaking, there is no cost methodologies difference between goods sold to the domestic market and those sold for export. Except the specifications differences between different models since Fortune's products are capital goods and make to order products.

Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.

Response:

Since Fortune is adopting actual cost accounting system there is no

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significant differences between the costs as normally determined in accordance with Taiwan GAAP.

3 In calculating the unit cost to make and sell, provide an explanation if the allocation method used (eg number, or weight etc) to determine the unit cost differs from the prior practice of your company.

Response:



G-6 Major raw material costs

List major raw material costs, which individually account for 10% or more of the total production cost.

For these major inputs:

- identify materials sourced in-house and from associated entities;
- identify the supplier; and
- show the basis of valuing the major raw materials in the costs of production you have shown for the goods (eg market prices, transfer prices, or actual cost of production).

Where the major input is produced by an associate of your company the Commission will compare your purchase price to a normal market price. If the associate provides information on the cost of production for that input such cost data may also be considered.

Normal market price is taken to be the price normally available in the market (having regard to market size, whether the input is normally purchased at 'spot prices' or under long term contracts etc).

The term associate is defined in section 269TAA of the Customs Act. Included in that definition are companies controlled by the same parent company (a company that controls 5% or more of the shares of another is taken to be an associated company); companies controlled by the other company; and companies having the same person in the board of directors.

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Important note: If the major input is sourced as part of an integrated production process you should provide detailed information on the full costs of production of that input.

Response:

Please refer to Confidential Attachment G-6 for required table.

Please note,

- 1. None of any suppliers is affiliated with Fortune,
- 2. None of the major inputs are produced by an associate of Fortune,
- 3. all major inputs are purchased at normal market price.

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SECTION H EXPORTER'S DECLARATION

did, during the and have con inquiry, certify	are that(company) e period of investigation export the goods under consideration npleted the attached questionnaire and, having made due y that the information contained in this submission is complete to the best of my knowledge and belief.
did not, during	are that(company) g the period of investigation, export the goods under and therefore have not completed the attached questionnaire.
Name	·
Signature	·
Position in	
Company	·
Date	

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SECTION I CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – general information	>
Section B – export price	
Section C – like goods	
Section D – domestic price	
Section E – fair comparison	
Section F – exports to third countries	
Section G – costing information	
Section H – declaration	
Electronic Data	Please tick if

Electronic Data	Please tick if you have provided spreadsheet
INCOME STATEMENT	
TURNOVER – sales summary	
AUSTRALIAN SALES – list of sales to Australia	
DOMESTIC SALES – list of all domestic sales of like goods	
THIRD COUNTRY – third country sales	
PRODUCTION – production figures	
DOMESTIC COSTS – costs of goods sold domestically	
AUSTRALIAN COSTS – costs of goods sold to Australia	

List of Attachments

Attachments	
A-3-5	Worldwide organizational Chart
A-3-9	Internal Organization Chart
A-3-10 (a)	2012 Annual Report (Chinese & English)
A-3-10 (b)	Brochure
A-4-3 (a)	Chart of Accounts
A-4-3 (b)	Consolidated Audited FS-2011 (Chinese & English)
A-4-3 (c)	Consolidated Audited FS-2012 (Chinese & English)
A-4-3 (d)	Un-Consolidated Audited FS-2011 (Chinese & English)
A-4-3 (e)	Un-Consolidated Audited FS-2012 (Chinese & English)
A-4-3 (f)	Consolidated Audited FS-January to June 2013 (Chinese & English)
A-5	Income Statement
A-6	Turnover
B-1	Australian Customer Information
B-2 (a)	Tender Process & Australian Sales Flowchart
B-2 (d)	Sales Representative Agreement
B-2 (e)	Winning Tender Bids
B-4	Australian Sales Listing
B-9 (a)	Australian Transaction Sample 1
B-9 (b)	Australian Transaction Sample 2
C-1	Australian Sales Specification
C-2	Australian Sales MVA & kV Listing
C-3	Domestic Sales MVA & kV Listing
C-4	Power Transformer Technical Brochure
D-1 (a)	Domestic Sales Flowchart
D-1 (b)	Activities Chart
D-1 (c)	Domestic Contract Sample
D-4	Domestic Sales Listing
D-7 (a)	Domestic Transaction Sample 1
D-7 (b)	Domestic Transaction Sample 2
E-2.1	Physical Characteristics Variation Table
F	Third Countries
G-1	Production Process
G-2	Production
G-4	Domestic CTMS
G-5	Australian CTMS
G-6	Major Raw Material Costs

A-3-10 (b) Brochure







Welcome to Fortune Electric



We are Fully-Integrated Manufacturers of High-Quality Power Equipment

- Power Transformers
- Distribution Transformers
- Switchgear

Offering Superior Project Planning, Customer Service, and Products with Greater Reliability and Greater Efficiency

Our goal is to be the supplier of choice to

- Utilities
- Engineering Firms
- Municipal Planners
- Manufacturing Plants and Facilities

Count on us to deliver Value

- Innovative Products, Custom Designed to Your Specifications

 Low loss, high efficiency, with a cleaner environment in mind
- State-of-the-Art Manufacturing Processes

 Constantly improving techniques, equipment & facilities
- Quality Control & Testing
 In-process inspections, factory & field testing with the latest equipment
 - On-Time Deliveries

Complying with project schedules & deadlines

• Transportation Services

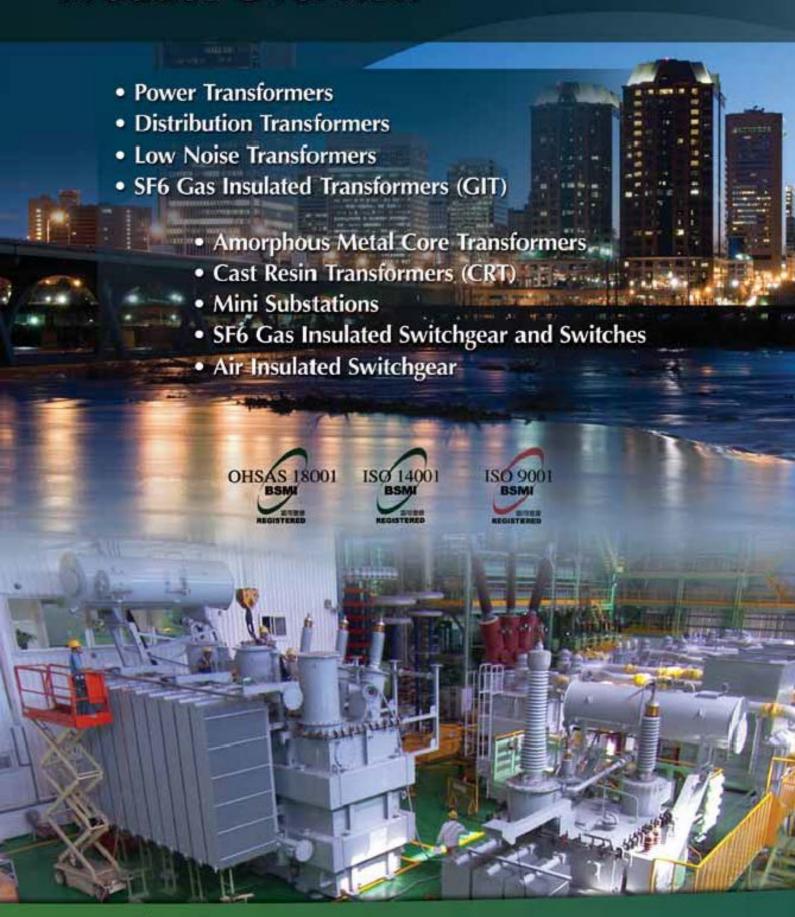
Planning for cost-effective & efficient routing

Customer Service

Complete support and project management throughout all phases



Product Overview





Fortune Electric has been servicing customers around the globe since 1980. We have significant experience planning, installing and servicing units in the Americas, the Pacific Rim and Mainland China, the Middle East and Australia.

We continually strive to establish ourselves as a leader in the power industry. We offer transformers up to 400kV 775mVA for generation, transmission and distribution applications. We also offer Remote Terminal Units (RTU) and Smart Maintenance Systems (SMS) for automatic monitoring and early fault detection.



Product Offerings

Cast Resin Transformers

Capacity & Ranges: 36kV 10mVA

- Excellent mechanical strength against short circuit and lightning impulse
- · Resistance to harsh ambient conditions
- · High short time overload capacity
- · Self-extinguishing, Non-explosive
- Easy maintenance and installation
- Excellent overload capacity



Above: 3-Phase 6.6kV 7000kVA Cast Resin Dry Type Transformer

Amorphous Metal Core Transformers



Above: 3-Phase 22.8kV 1506kVA Amorphous Metal Core Cast Coil Transformer

Below: Central Control Panel

Capacity & Ranges: 36kV 3mVA

- · Low core loss
- · High efficiency
- · High reliability
- · Long operating life
- · Excellent overload capacity
- · Energy conservation
- · Good anti-harmonic ability

Below: Mini Substation



Mini Substation

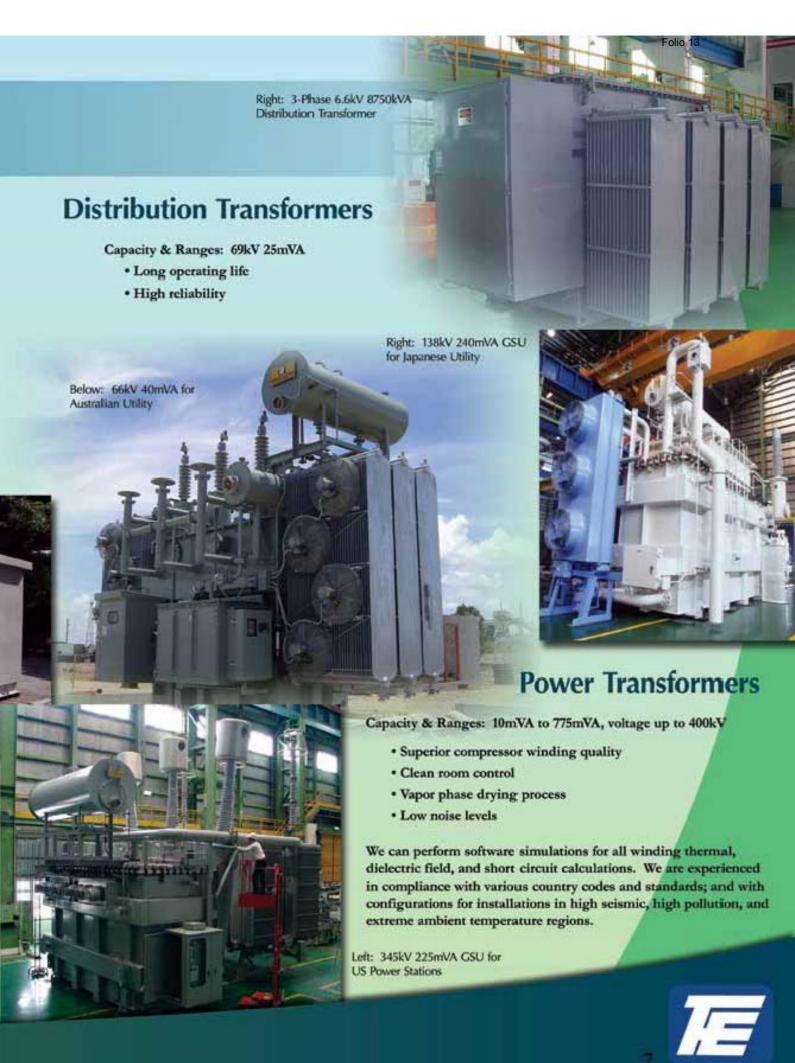
Capacity & Ranges: 33kV 2500kVA transformers with LVDB (Low Voltage Distribution Board)

- Prefabricated, compact design, reduced footprint, reduced cost, standard truck transport
- · Fully enclosed, protection for the public
- · Ready to connect to electrical network

Switchgear

Capacity & Ranges: 24kV 1250A 25kA/3sec, arc-proof tested compliance with IEC 62271-200

- · Module design
- · Easy installation
- · Easy operation



Fully-Integrated Supplier



Transportation Management

- Planning, Routing Surveys & Permitting
- Report of Survey Results and Logistics Planning
- Factory-to-Pad Turnkey Shipping
- · Land & Sea, Heavy Hauling, Rigging & Re-welding
- We Manage Shipments to meet Schedules & Budgets

Systems Business Department

We have upgraded our Technology Center to offer engineering and other technical support. Planning, Design and Installation of New Technologies:

- · MRT, Subway & High-Speed Rail
- Sustainable Energy Gen Facilities including Solar & Wind
- A Leader in Low Noise Designs
- A Leader in RTU & SMS ...
 Automatic Monitoring for Lifespan and Potential Interruptions



Specifications, Simulations, Customizations Distribution & Power Transformers up to 400kV Distribution Equipment HV, LV Switchgear

Pre-Sale Planning After-Sale Service Main Products

Turnkey

Scheduled, RTU and Smart Maintenance* Installation Supervision & Punch List Custom Configurations Solar, Wind, Substations

Maintenance

We offer standard warranties and extended warranties. We work to minimize any downtime and respond promptly to each trouble-shooting inquiry.

We offer four stages of After-Sale Service and recommend that our customers conduct and log all four:

- Scheduled, After-Sale Maintenance
- Daily, Routine Maintenance
- Scheduled, Periodic Maintenance
- Fortune Electric's Smart Maintenance

Our Company

Founded in 1969 in Tucheng,
Taiwan, we maintain our
headquarters and three
manufacturing locations in
Taiwan and one in China. We
have two offices in the US with
sales, logistics and customer
service, and one office in
Australia with sales and
customer service. We have sales
representatives throughout
North America and Australia.



Milestones

1980's

Working with McGraw-Edison, we developed transformers with capacities up to 230kV 120mVA.

1994

We were the first heavy power equipment manufacturer in Taiwan to achieve ISO 9001 and ISO 9002 certification.

2008 was a banner year for us ... We won multiple awards for product development and business expansion:

- Excellence for Customer Centricity, GE Energy, Shanghai, China
- Export Growth in the 2007 Gold Trade Competition
- Public Engineering Excellence,
 Ministry of Economic Affairs, Taiwan.

1990's

In cooperation with Hitachi, we developed transformers with capacities up to 345kV. In cooperation with Allied-Signal (now Hitachi), we began to manufacture amorphous metal core transformers.

2000's

We continue new product development and are now designing units up to 500kV.

2010's

KEMA Laboratory certified our short circuit 230kV 240mVA power transformers, and we are actively selling these in North America. In addition, our 11kV 2500kVA CESI SCT is certified.



"By employing highly skilled and dedicated people, we strive to deliver quality products along with superior project planning and after-sale service. We are grateful for each opportunity to serve our customers in the power industry worldwide.

Our goals are to
Assist our customers as they
work to improve:

- Reliability
- Efficiency
- Safety

And achieve the highest levels of customer satisfaction."

Ms. Jean Hsu Director



"At Fortune Electric, we are dedicated to engineering innovative products, to state-of-the-art manufacturing processes, and to the well-being of our customers and our employees."

Mr. Pedro B. F. Hsu President



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Los Angeles, CA USA

Phone: 310.293.8300

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Email: Fortune@fortuneelectric.com www.fortuneelectric.com

Fortune Electric Company, Ltd.

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C-4 Power Transformer Technical Brochure



Aerial View of Fortune Electric's Power Transformer Division

















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Power Transformer





Introduction



 $F \, \text{ortune Electric} \, \, \text{is an internationally recognized manufacture of} \, \,$ highly reliable Power Transformer and Electrical Apparatus. We have transformers installed throughout the United States, Canada, United Kingdom, Japan, Australia, Africa, and Taiwan as well as other nations around the world.

Our customers list include many prestigious; General Electric, Siemens, Westinghouse, Bechtel, Black & Veatch, BC Hydro to name a few.



230kv 250MVA Auto Power Transformer for the U.S.A.



230kv 350MVA GSU (Generator Step-up Power Transformer) for the U.S.A.





138kv 240MVA Power Transformer for Japan



161 kv 290 MVA GSU (Generator Step-up Power Transformer) for IPP



345kv 300MVA Power Transformer for storage-Pumped



161kv 60MVA SF6 Gas Insulated Transformer



345kv 250MVA Power Transformer for Combustion

161kv 30MVA Single-Phase Emergency Mobile Transformer



345kv 500MVA Power Transformer for EHV Substation

Core

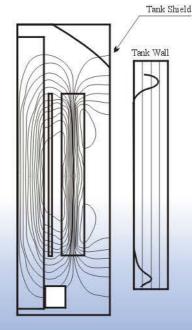


Our transformer design technology is solidly based on a foundation of time-tested experience. From the solid foundation, Fortune Electric has advanced the design with the state of the art materials and technology innovations. Fortune Electric developed a wide variety of computer programs to assist in the design of transformer component such as cores, coils and tanks. Using finite element analysis methods, Fortune Electric's engineers have developed computer programs to include impulse simulation programs, short circuit analysis programs and leakage flux field mapping programs, In addition to using our own simulation programs, Fortune Electric uses the Andersen Program for Mechanical Force Analysis, which is a highly requested program throughout the United States and Europe.

12 13 14 15 16 21 22 23 24 24 25 26 27 28

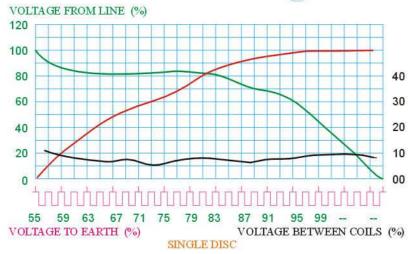
Electrical Field Analysis

3

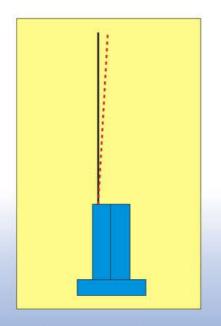


Tank Strength Analysis Leakage Flux Distribution Analysis

Andersen Program



Impulse Voltage Distribution Analysis



Seismic Simulation Analysis

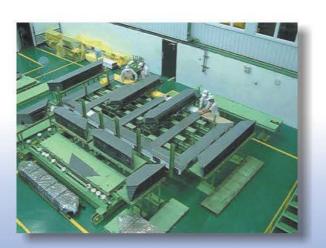
We use utilize Core Form Construction For all of our power transformers. This construction method utilize high-grade cold rolled grain oriented silicon steel with miter-joint construction to maximize the benefit in build up of the core laminations. Core construction is based on a V-notch lap core, and a step-lap core is used for all low noise transformer requirements.

Our three-phase transformers can have either three or five leg cores, and single-phase transformers have a three-leg core.

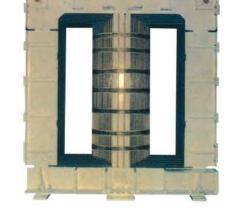
Low Losses, Low Noise



Three Phase 5-Leg Core



Core Staking



Center Core (Single Phase 3-Leg Core)



Three Phase 3-Leg Core

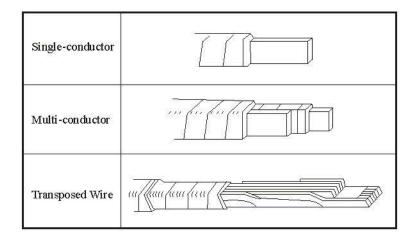


Lifting a Completed 5-leg core

E Winding

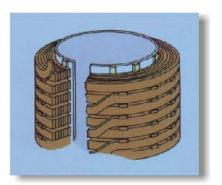
.

Our windings are wound using high quality copper conductor, which consist of three types of conductors: a single-conductor, multi-conductor and transposed wire. These are shown in the figures below. There are three winding methods: Helical, Disk, and Cylindrical windings, shown below. The type of conductors required and windings method will be determined by the customer's requirements. These requirements most often are based on capacity, voltage, electrical stress, and/or short circuit force, etc.

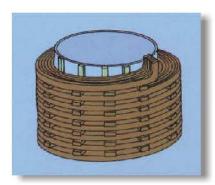


Epoxy bonded Transposed Wires are used in large capacity power transformer for their excellent short circuit strength.

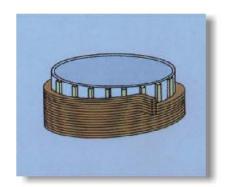
- Low load losses
- Good electrical strength
- Excellent mechanical strength



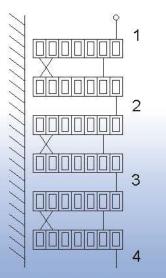
Disk Winding



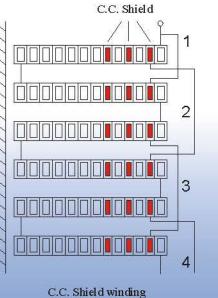
Helical Winding



Cylindrical Winding



interleaved winding



Two Shielding Methods for high-voltage windings

1. Interleaved winding

(Used for Single Conductor and Multi-Conductor)

2. Condenser coupling shield winding

(Used for Transposed Wire)

Continuously developing new winding techniques and equipment in order to improve reliability, quality and to maintain rapid delivery.



Vertical Winding Machine



Core & Coil Assembly 7

High - Voltage Winding



Transformer Core and Coil

Core / Coil Assembly Drying

The core and coil are stayed in a low humility room after vapor phase drying process.

This is activity maintains the relative humility to a very low percentage to ensure the high quality of our products. The tanking of the core / coil assembly will follow at a time suitable to the customer after inspecting the subassemblies.



Low Humility Room



Vapor Phase Drying Oven

Transformer main body delivered to Low Humility Room (left figure) after Vapor Phase Drying Process (right figure) to prevent moisture in the ambient air from being reabsorbed.

Accessories

Testing

Æ

Conservator

* Open Type / * Nitrogen Sealed Type / * Diaphragm Type / * Air Bag Type







Air Bag Type



Diaphragm Type

Cooling System

- * Oil-Cooling Cooler
- * Radiator
- * Water-Cooled Cooler



Oil-Cooling Cooler

Radiator



Water-Cooled Cooler

Bushing

- * Oil to Oil
- * Oil to Air
- * Oil to SF6 Gas

Buchholz Relay

With Alarm and Trip Contact













Pressure Relief Device

Oil Level Indicator

With Alarm Contact

With Trip Contact

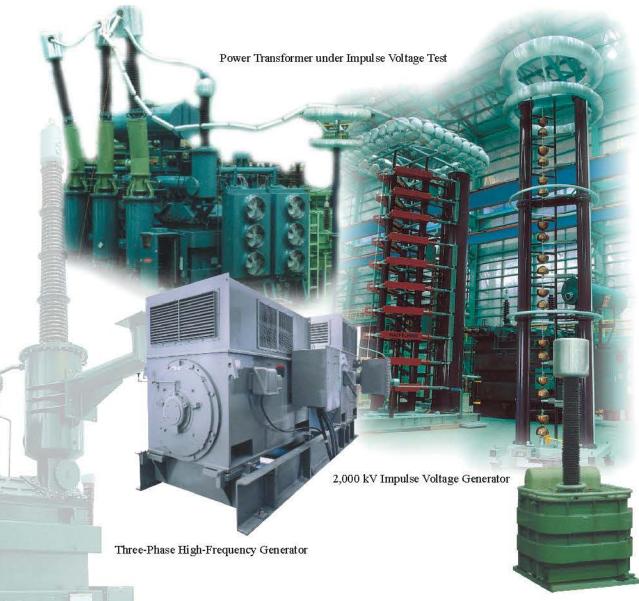


Tank

Transformer tanks are fabricated using high quality steel and welded by a qualified welder.

After fabrication the tanks are subjected to a leakage test at all weld points and seams prior moving to the next stage of the assembly.

Fortune Electric's testing laboratory and facilities include a three-phase high frequency test generator for induced voltage testing and impulse voltage testing for equipment up to 2,000 kV.



550 kV Applied Voltage Test Transformer





E Transportation

Fortune Electrical considers in the design phase, all the factors that will assure the arrival of a highly reliable transformer at it point of delivery.

ransformer limits of height and weight in the transformer design are critical to safe effective routing of the transformer.









 \overline{F} ortune Electrical provides an installation-supervising for domestic overseas business.



Transformer Site Installation-supervising Services in U.S.A.



Lifting a transformer main body with ship crame