

26 JUNE 2014



The Director
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Anti-Dumping Commission
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BY EMAIL

23 June 2014

Dumping Investigation ADC 239 – PV Modules or panels being exported from China

Dear Madam / Sir,

FRV Service Australia Pty Ltd is a developer, owner and operator of solar generation Assets. We are constructing the 24MWdc Royalla Solar Farm near Canberra and 70MWdc Moree Solar Farm in northern NSW and have a development pipeline of approximately 1000MW within Australia. Our parent shareholders have also developed/constructed/operate approximately 500MW of solar projects worldwide and have offices in many countries.

FRV's utility scale projects have been designed to utilise polycrystalline photovoltaic modules of 72 cell design, currently having a capacity of 300W to 305W. Previously 72 cell modules have had lower capacity (eg our Royalla Solar Farm project uses 295W 72 cell modules, however, with improvement in cell performance 72 cell modules now typically produce 300W and greater in the same dimension panel).

It is FRV's view that the photovoltaic modules being sourced for our projects, cannot be replaced with equivalent goods currently being produced or manufactured in Australia.

We consider that like good to the goods we require for utility scale projects are not available from a local manufacturer. The only local company we have identified who claim to manufacture within Australia is Tindo. We understand that they assemble 60 cell 250W modules only, from mainly imported components.

In addition to not manufacturing or having the capability to manufacture 72 cell modules or panels with of 300watts or greater, the sole Australian manufacturer's production capacity is extremely limited. Even if their facility was operating at maximum capacity and 100% of this production was dedicated to supplying FRV's Moree Project, it would not have the ability to meet the required delivery schedule for modules in order to meet the project completion requirements.

In any event we note the Tindo application notes that a 300W module is not produced in

Australia and that Tindo are not certified to produce this model.

If our projects were redesigned to accommodate lower capacity 60 cell modules our projects would be considerably more expensive and almost certainly not financially viable due to material increases in costs of other aspects of the project (eg module racking, delivery costs etc). Further the Moree project would not fit within the available land.

FRV utilises project finance for the construction of all our projects. Commercial financiers do not consider Tindo Solar a suitable supplier for the purpose of non-recourse project finance. Tindo were not listed in the Bloomberg New Energy Finance bankability survey (28th April 2014) as a bankable module supplier, meaning that financiers and suppliers must rely on their own investigations. FRV encouraged its constructor to investigate the use of Tindo modules for our Moree project and unfortunately Tindo declined to cooperate with the supplier preventing Tindo from being qualified technically and commercially to supply to the project. Further, we understand Tindo does not have sufficient balance sheet capability to satisfy financiers.

Tindo cannot be factory audited and are not certified to ISO9001, ISO 14002 or OHSAS18001 as is commonly required for utility scale projects. Tindo Solar modules are not certified for ground-mounted systems in the Clean Energy Council's accreditation system.

There are economies of scale applicable to the production of larger wattage modules, therefore the price per watt of a 250W is not comparable to a 300/305W module.

It is FRV's opinion that the goods under investigation for Dumping should be limited to 60 cell photovoltaic modules and that other larger (such as 72 cell) photovoltaic modules should be excluded from the investigation and any potential action taken by yourselves.

If you require further information please don't hesitate to contact me.

Yours sincerely,



Steve Jackson
Head of Development
FRV Services Australia Pty Ltd