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**INVESTIGATION 239**

**ALLEGED DUMPING OF CERTAIN CRYSTALLINE SILICON  
PHOTOVOLTAIC MODULES OR PANELS**

**EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA**

**VISIT REPORT – EXPORTER**

**ReneSola Jiangsu Limited**

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WILL BE REVIEWED BY THE CASE MANAGEMENT TEAM AND MAY NOT REFLECT  
THE FINAL POSITION OF THE ANTI-DUMPING COMMISSION

**December 2014**

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## ABBREVIATIONS

The Act	<i>Customs Act 1901</i>
ACBPS	Australian Customs and Border Protections Service
ADN	Anti-Dumping Notice
China	The People's Republic of China
CIF	cost, insurance and freight
COGS	Cost of goods sold
The Commission	Anti-Dumping Commission
The Commissioner	the Commissioner of the Anti-Dumping Commission
CTM	Cost to make
CTMS	Cost to make & sell
FOB	Free On Board
GAAP	Generally accepted accounting principles
The goods	the goods the subject of the application (also referred to as the goods under consideration or GUC)
PAD	Preliminary Affirmative Determination
The Parliamentary Secretary	the Parliamentary Secretary to the Minister for Industry
PV modules or panels	Certain crystalline silicon photovoltaic modules or panels
ReneSola Australia	ReneSola Australia Pty Ltd
ReneSola Jiangsu	ReneSola Jiangsu Limited
ReneSola Zhejiang	ReneSola Zhejiang Limited
SEF	Statement of Essential Facts
SG&A	Selling, general and administration
Tindo	Tindo Manufacturing Pty Ltd
True Value Solar	True Value Solar Pty Ltd

# 1 BACKGROUND AND PURPOSE

## 1.1 Background

On 4 February 2014, Tindo Manufacturing Pty Ltd (Tindo) lodged an application requesting that the Parliamentary Secretary to the Minister for Industry (Parliamentary Secretary) publish a dumping duty notice in respect of certain crystalline silicon photovoltaic modules or panels (PV modules or panels) exported to Australia from the People's Republic of China (China).

In the application Tindo alleged that it had suffered material injury caused by certain PV modules or panels exported to Australia from China at dumped prices.

Tindo claims that the Australian industry had been injured through:

- lost sales revenue;
- price depression;
- price suppression;
- loss of profit; and
- reduced profitability.

On 14 May 2014, the Commissioner of the Anti-Dumping Commission (the Commissioner) initiated an investigation in the alleged dumping of PV modules or panels (the goods) exported to Australia from China. A public notification of the initiation of the investigation was made in *The Australian* newspaper and was also published on the Anti-Dumping Commission's (Commission's) website.

Following the initiation of the investigation, a search of the Australian Customs and Border Protection Service's (ACBPS's) import database indicated that ReneSola Jiangsu Limited (ReneSola Jiangsu) exported PV modules or panels from China during the period 1 July 2012 to 31 December 2013 (the investigation period).

From the ACBPS import database, the Commission noted that a large number of companies exported PV modules or panels from China. Section 269TACAA of the *Customs Act 1901* (the Act) states that where the number of exporters is so large that it is not practicable to examine the exports of all those exporters, a selection can be made on the basis of exporters who are responsible for the largest volume of exports to Australia that can be reasonably examined.

The Commission noted that ReneSola Jiangsu was one of four exporters which exported the largest volumes of PV modules or panels to Australia in the investigation period. On 14 May 2014, the Commission selected ReneSola Jiangsu to be included in the sample and sought its cooperation with the investigation. The Commission provided an exporter questionnaire for the company to complete. ReneSola Jiangsu provided a complete exporter questionnaire response by the required date.

During an assessment of the exporter questionnaire response, the Commission noted that a related company, Zhejiang Yuhui Solar Energy Source Co Ltd (now known as ReneSola Zhejiang Limited), exported PV modules or panels during the investigation

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period and sought financial data from that company, which ReneSola Jiangsu provided. The treatment of this related company is discussed in section 2.2 below.

Having assessed the information provided in the exporter questionnaire response, we determined that a verification visit was required.

### 1.2 Purpose of visit

The purpose of the visit was to verify information submitted in the exporter questionnaire response. Information verified during the visit has been used to make preliminary assessments regarding:

- like goods;
- who is the exporter and who is the importer;
- export prices;
- normal values; and
- dumping margins.

Prior to the visit, we provided an agenda to ReneSola Jiangsu. A copy of the visit agenda is at **Confidential Attachment GEN 1**

### 1.3 Meeting details

Company	ReneSolar Jiangsu Limited
Dates of visit	26 November – 1 December 2014

The following people were present at various stages of the meetings.

ReneSolar Jiangsu Limited	YanJun Li (Nick) – General Manager Maggie Ma – Financial Vice President Bo Zhao – Legal Director Ruzhong Hou – Technical Director Qinghua Yang – Financial Manager Deng Zhi – Sales Manager Aiguo Ding – Chief Accountant of Sales Qinghua Yang – Financial Manager Kaile Gong – Customs Manager Tiecheng Bao – Operating Manager Wenjie Huang – Planning Manager Michael Wu – Cost Manager Xiangyi Liu – Chief Accountant
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ReneSola Zhejiang Limited	Jiani Xu – Financial Manager
Consultants	Kevin Reilly – Principal, GTR Consulting Shen Qian (Connie) – Partner, Guantao Law Firm Alice Li – Guantao Law Firm
Anti-Dumping Commission	Matthew Williams – Assistant Director An Chew – A/g Assistant Director

### 1.4 Investigation process and timeframes

We advised the company of the investigation process and timeframes as follows.

- The investigation period is from 1 July 2012 to 31 December 2013.
- The injury analysis period is from 1 January 2010 for the purpose of analysing the condition of the Australian industry.
- A preliminary affirmative determination (PAD) may be made no earlier than day 60 of the investigation (13 July 2014) and provisional measures may be imposed at the time of the PAD or at any time after the PAD has been made.

The Commissioner of the Anti-Dumping Commission will not make a PAD until (and if) it becomes satisfied that there appears to be, or that it appears there will be, sufficient grounds for the publication of a dumping duty notice and/or a countervailing duty notice.

This was distinguished from the 'reasonable grounds' threshold for initiation of the investigation.

- The Statement of Essential Facts (SEF) for the investigation was due to be placed on the public record by 1 September 2014. The Commission published Anti-Dumping Notice No. 2014/106 on 27 October 2014, which stated that the Parliamentary Secretary has approved an extension to the SEF date. The SEF will now be placed on the public record by 5 March 2015 or such later date allowed by the Parliamentary Secretary under s.269ZHI of the Act.

The SEF will set out the material findings of fact on which the Commissioner intends to base its recommendations to the Parliamentary Secretary, and will invite interested parties to respond, within 20 days, to the issues raised therein.

- Following receipt and consideration of submissions made in response to the SEF, the Commissioner will provide its final report and recommendations to the Parliamentary Secretary.

This final report is due no later than 19 April 2015, unless an extension to the SEF is approved by the Parliamentary Secretary.

## 1.5 Visit report

We explained to the company that we would prepare a report of our visit (this report) and provide it to the company to review its factual accuracy and to identify those parts of the report it considers to be confidential.

We explained that, in consultation with the company, we would prepare a non-confidential version of the report and place this on the public record.



## 2 COMPANY INFORMATION

### 2.1 General

ReneSola Jiangsu stated that it commenced operations at its current factory in Yixing in 2009 manufacturing and selling PV modules or panels. It advised that in addition to the manufacturing of PV modules or panels, it also manufactures PV cells, which represent approximately █% of its production by value.

In its exporter questionnaire response, ReneSola Jiangsu included a diagram of the ReneSola Group ownership structure, which shows that it is wholly owned by ReneSola Zhejiang Limited (ReneSola Zhejiang). It advised that ReneSola Zhejiang was known as Zhejiang Yuhui Solar Energy Source Co Ltd prior to January 2013 when it changed its name. ReneSola Zhejiang is wholly owned by ReneSola Limited, which is incorporated in the British Virgin Islands and listed on the New York Stock Exchange.

### 2.2 Related parties

In its exporter questionnaire response, ReneSola Jiangsu included a complete list of the ReneSola affiliated companies, which provided details of each company's registered location, percentage holding, activities and date of establishment.

[REDACTED]

[Confidential information relating to Renesola Jiangsu's commercial arrangements regarding supply and sale of PV cells]

[REDACTED] we

consider it appropriate to collapse ReneSola Jiangsu and ReneSola Zhejiang into a single entity for the purpose of this anti-dumping investigation (see section 4.4 below for further discussion). ReneSola Jiangsu expressed support for this approach. [Confidential information relating to the relationship between the companies]

ReneSola Jiangsu also advised that it initially sold some PV modules or panels to another related company, [REDACTED]. [Confidential information]

, however those sales were subsequently returned back to ReneSola Jiangsu.

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In relation to sales to Australia, other than sales through ReneSola Zhejiang, ReneSola Jiangsu sold PV modules or panels to a related company, ReneSola Australia Pty Ltd (ReneSola Australia), in addition to other unrelated customers. An analysis of the export sales spreadsheet indicated that ■% of ReneSola Jiangsu's export sales of PV modules or panels to Australia during the investigation period were to ReneSola Australia. ReneSola Jiangsu stated that it treats ReneSola Australia as it would any other unrelated customer and priced accordingly. An assessment of the arm's length nature of sales between ReneSola Jiangsu and ReneSola Australia is discussed in section 4.7 below.

### 2.3 Relationship with suppliers and customers

#### 2.3.1 Customers

ReneSola Jiangsu stated that other than the intercompany relations outlined in section 2.2 above, it is not related to any of its other customers. We found no evidence of any relationship other than a commercial buyer/seller relationship between ReneSola Jiangsu and its unrelated customers.

#### 2.3.2 Suppliers

ReneSola Jiangsu stated that other than the intercompany relations outlined in section 2.2 above, it is not related to any of its other suppliers. We found no evidence of any relationship other than a commercial buyer/seller relationship between ReneSola Jiangsu and its unrelated suppliers.

### 2.4 Accounting structure and details of accounting system

In its exporter questionnaire response, ReneSola Jiangsu states that its financial year is from 1 January to 31 December and its accounting practice is consistent with the Generally Accepted Accounting Principles (GAAP) in China.

In the exporter questionnaire response, ReneSola Jiangsu included the following documents:

- Chart of accounts
- ReneSola Jiangsu 2012 and 2013 audited financial report
- ReneSola Limited 2013 Form 20-F annual report

ReneSola Jiangsu's financial accounts were audited by Zhonglei Certified Public Accountants Co., Ltd in 2012 and Wuxi Dazhong Certified Public Accountants Co., Ltd in 2013.

ReneSola Jiangsu advised that it uses a Chinese enterprise resource planning system called UFIDA NC.

### 3 THE GOODS UNDER CONSIDERATION AND LIKE GOODS

#### 3.1 The goods

The goods the subject of the application (the goods) are:

*Certain crystalline silicon photovoltaic modules or panels, whether exported assembled or unassembled, and whether or not they have an inverter, capable of producing any power in terms of watt.*

*The following product types are excluded from the application:*

- *cells and wafers of the type used in PV modules or panels;*
- *solar chargers that consist of less than six cells, are portable and supply electricity to devices or charge batteries; and*
- *PV products that are permanently integrated into electrical goods, where the function of the electrical goods is other than power generation, and where these electrical goods consume the electricity generated by the integrated crystalline silicon photovoltaic cell(s).*

The application contains the following additional information in relation to the goods the subject to the application.

*A PV module is a packaged, connected assembly of solar PV cells. A solar PV cell is an electrical device that converts the energy of light directly into electricity by the photo-electric effect. It is a form of photoelectric cell which, when exposed to light, can generate and support an electric current without being attached to any external voltage source, but does require an external load for power consumption.*

*The two key species of silicon crystalline cells in commercial use are poly crystalline (also known as multi crystalline) and mono crystalline cells. Both PV modules composed of poly crystalline and mono crystalline silicon cells are the goods the subject of this application.*

*A solar panel (or array) is a set of PV modules electrically connected and mounted on a supporting structure. The PV module can be used as a component of a larger PV system to generate and supply electricity in commercial and residential applications.*

*The two forms of power generated by the two different types of PV modules or panels are alternating current (AC) and direct current (DC). The AC modules or panels are ready to be plugged into the grid by use of an on-board micro-inverter, while the DC PV modules or panels need to be connected to a separate inverter that converts the electricity generated to AC power. Both AC and DC PV modules or panels are included in the description of the goods.*

### 3.1.1 Tariff classification

The goods are classified to the following tariff subheadings in Schedule 3 to the Customs Tariff Act 1995:

- 8541.40.00, statistical code 53;
- 8501.61.00, statistical codes 33 and 24;
- 8501.62.00, statistical code 34;
- 8501.63.00, statistical code 40; and
- 8501.64.00, statistical code 41.

The rate of Customs duty payable under each of the tariff subheadings is as follows:

- 8541.40.00 (statistical code 53); 8501.63.00 (statistical code 40) and 8501.64.00 (statistical code 41) are duty free; and
- 8501.61.00 (statistical codes 33 and 24) and 8501.62.00 (statistical code 34) have a duty rate of 5 per cent for all countries except for DCS countries (4 per cent) and DCT (5 per cent). China is defined as DCS therefore duty is payable at the rate of 4 percent.

### 3.2 Manufacturing facilities

ReneSola Jiangsu stated that it has 4 separate workshops manufacturing PV modules or panels at its manufacturing facilities in Yixing, Jiangsu Province, China. During the visit, we conducted an inspection of one of its workshops and the PV module or panel production process.

ReneSola Jiangsu summarised the PV module or panel production process as follows:

1. Manufacture or purchase of PV cells
2. Soldering the PV cells
3. Laying the PV cells onto a backboard
4. Visual inspection
5. Lamination
6. Assembling the aluminium frame and junction box
7. Insulation, flash and EL test
8. Final inspection
9. Packaging

ReneSola Jiangsu advised that its production capacity of PV modules or panels is 1.2gigawatt per annum.

### 3.3 Product range

ReneSola Jiangsu stated that it manufactures and sells both mono and poly PV modules or panels. It generally produces three sizes of modules, being 72 pieces with 125mm cells, 72 pieces with 156mm cells and 60 pieces with 156mm cells. It offers the choice of a regular junction box, a special 'surveillance' junction box or no junction box. It also offers the option of including a DC optimiser.

ReneSola Jiangsu advised that each cell that goes into a PV module or panel [REDACTED]  
[REDACTED]  
[REDACTED]. [Confidential information regarding cell quality] We note that over [REDACTED] % of PV modules or panels manufactured by ReneSola Jiangsu are regular prime PV modules or panels where the cells used are unsorted.

ReneSola Jiangsu stated that while the majority of its cells are sourced domestically in China, it also manufactures PV modules or panels using only imported cells. It advised that PV modules or panels with imported cells are generally destined for export to the USA.

ReneSola Jiangsu explained that it uses an [REDACTED] digit product code to differentiate the different models of PV modules or panels. During the verification visit, ReneSola Jiangsu provided us with a table showing what the digits represent (**Confidential Attachment GOODS 1**) based on the following characterises:

1. Customer type
2. Size (number of cells and cell size)
3. Cell type (mono or poly)
4. Cell grade
5. Whether it uses imported cells
6. Whether it has a junction box and the type
7. Whether it has a DC optimiser

### 3.3.1 Goods exported to Australia

During the investigation period, ReneSola Jiangsu exported [REDACTED] different models of PV modules or panels. We note that all PV modules or panels exported to Australia were regular prime using Chinese cells with a regular junction box and without a DC optimiser. The main differentiating characteristics were size and cell type as follows:

Model	Size	Cell type
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

### 3.3.2 Domestic sales of like goods

ReneSola Jiangsu sold [REDACTED] different models (based on the product code) of PV modules or panels on the domestic market during the investigation period, including the [REDACTED] models exported to Australia. Therefore, we consider that ReneSola Jiangsu sells PV modules or panels on the domestic market that are identical or have characteristics closely resembling the goods exported to Australia.

[Confidential information

on pricing] Therefore, we consider it appropriate to collapse models with different customer type and cell grade with similar models.

For the purpose of model matching, we consider it appropriate to have regard to the other 5 characteristics. As a result, we consider that only domestic models that were regular prime using Chinese cells with a regular junction box and without a DC optimiser were appropriate to compare with the export models and that the domestic models were matched to the export models having regard to the size and cell type.

### **3.4 Like goods – preliminary assessment**

We consider that ReneSola Jiangsu's PV modules or panels sold on the domestic market have characteristics closely resembling the goods exported to Australia and are therefore like goods in accordance with subsection 269T(1).

## 4 SALES TO AUSTRALIA

### 4.1 Australian export sales process

#### 4.1.1 General

As part of its exporter questionnaire response, ReneSola Jiangsu provided a flowchart outlining its Australian export sales process (**Confidential Attachment EXP 1**).

ReneSola Jiangsu explained that it has a related company in Australia, ReneSola Australia, which sells PV modules or panels in the Australian market. ReneSola Jiangsu stated that ReneSola Australia was not established until August 2012. Therefore, at the beginning of the investigation period, all Australian customers ordered directly with ReneSola Jiangsu. Gradually during the investigation period, ReneSola Australia began placing orders with ReneSola Jiangsu and supplying PV modules or panels to Australian customers. Whilst most sales now go through ReneSola Australia, there remain some unrelated customers in Australia that continue to order directly with ReneSola Jiangsu.

ReneSola Jiangsu stated that it does not have any formal agreements with any Australian customers.

ReneSola Jiangsu stated that its parent company, ReneSola Zhejiang, sold a small volume of PV modules or panels to an Australian customer during the investigation period. ReneSola Jiangsu confirmed that ReneSola Zhejiang was only the invoicing company for this shipment and that all PV modules or panels exported to Australia were manufactured and shipped by ReneSola Jiangsu.

#### 4.1.2 Ordering

Australian customers place a purchase order with ReneSola Jiangsu by phone or email. Once ReneSola Jiangsu receives the purchase order, the sales team review the order and negotiate the price with the customer.

[REDACTED] [Confidential information on commercial negotiations]

Once agreement is reached [REDACTED], ReneSola Jiangsu drafts a sales contract which is sent to the customer for approval.

For each export sale, the selling price has to be approved by the CEO and vice president of the sales department. Sales terms are reviewed and approved by the legal department and the payment terms are reviewed and approved by the financial vice president.

#### 4.1.3 Payment terms

ReneSola Jiangsu explained that payment terms may vary depending on the size of the order and the credit history of the customer. For example, ReneSola Jiangsu sometimes requires a deposit, typically of [REDACTED]%, with the balance due up to [REDACTED] days after delivery. Other customers are required to pay the entire invoiced amount [REDACTED].

Due to the varying payment terms, the visit team considers it appropriate to deduct the cost of providing the payment terms from the export price to arrive at a cash payment term.

#### 4.1.4 Delivery

ReneSola Jiangsu stated that orders of standard PV modules or panels are generally supplied from inventory. If there are special requirements, or a particularly large order, ReneSola Jiangsu will arrange production.

The PV modules or panels are packaged in boxes at ReneSola Jiangsu's warehouse. Packaging mainly includes foam, paper boxes, pallets, string, plastic etc. The boxes are containerised prior to export, with each container holding up to [REDACTED] PV modules or panels. ReneSola Jiangsu engages third party companies to deliver the PV modules or panels from its factory in Yixing to a port in Shanghai. Once the PV modules or panels are shipped to Australia, shipping/release documents are sent to the customer.

ReneSola Jiangsu explained that the lead time from China to Australia generally includes a [REDACTED] week period from order to shipping and an additional [REDACTED] to [REDACTED] weeks on the water.

#### 4.1.5 Currency

During the investigation period, the majority of ReneSola Jiangsu's Australian export sales were invoiced and paid for in [REDACTED]. However, one customer, [REDACTED] paid for some of its PV modules or panels in [REDACTED]. ReneSola Jiangsu explained that this was because [REDACTED] head company was located in [REDACTED] and sometimes it preferred to pay in [REDACTED].

#### 4.1.6 Terms of trade

The majority of ReneSola Jiangsu's export sales were [REDACTED] to Australia (approximately [REDACTED]%). The remaining sales to Australia were [REDACTED]. For the [REDACTED] sales, the post exportation expenses [REDACTED] were organised and paid for by ReneSola Jiangsu. [Confidential trading terms]

#### 4.1.7 Discounts, rebates and allowances

ReneSola Jiangsu stated that it provides no rebates, discounts or allowances to Australian customers. The visit team found no evidence to suggest otherwise and no rebates, discounts or allowances were observed in commercial documents reviewed as part of Chapter 4.3 below.



#### 4.1.8 Date of sale

ReneSola Jiangsu stated that the date of sale in its Australian export sales listing is the commercial invoice date. This was confirmed from a review of the commercial documents provided as part of Chapter 4.3 below.

### 4.2 Verification of sales to audited financial statements

#### 4.2.1 General

The visit team applied the same methodology to reconcile ReneSola Jiangsu and ReneSola Zhejiang's domestic and Australian export sales data to the audited financial statements. This Section will cover the sales reconciliations for both companies.

The exporter questionnaire response included ReneSola Jiangsu's audited financial statements spanning the financial years 2012 and 2013 (Exhibits 10 to 13 of the exporter questionnaire response) and ReneSola Zhejiang's 2012 audited financial statements. At the visit, ReneSola Jiangsu provided us with a copy of ReneSola Zhejiang's 2013 audited financial statements (**confidential attachment EXP2**)

The exporter questionnaire response also provided the following spreadsheets in relation to both ReneSola Jiangsu and ReneSola Zhejiang:

- turnover spreadsheets (Appendix A-6 of the exporter questionnaire response);
- line by line Australian export sales listings (Appendix B-4 of the exporter questionnaire response); and
- line by line domestic sales listings (Appendix D-4 of the exporter questionnaire response).

At the visit, revised Australian export sales listings and domestic sales listings were provided for both ReneSola Jiangsu and ReneSola Zhejiang (**Confidential Attachment EXP 3**). A summary of the updates was provided (**Confidential Attachment EXP 4**).

At the visit, ReneSola Jiangsu and ReneSola Zhejiang also provided an excel spreadsheet and printouts of source documents to demonstrate the reconciliation of sales to financial statements (**Confidential Attachment EXP 5 and EXP 6**).

At the visit general ledger reports were ran from UFIDA NC and projected live where possible so that the visit team could observe the general ledger reports. ReneSola Jiangsu also provided the visit team with screenshots of the general ledger reports (when required) and reports as part of Confidential Attachment EXP 5 and EXP 6.

#### 4.2.2 Renesola Jiangsu

The visit team firstly attempted to match the consolidated turnover for ReneSola Jiangsu in its audited financial statements for 2012 and 2013 to the turnover of all products from ReneSola Jiangsu's exporter questionnaire response (turnover spreadsheet) by value.

To do so, ReneSola Jiangsu ran a report from its general ledger (general ledger report). ReneSola Jiangsu was able to show that its general ledger report reconciled exactly to the consolidated turnover in its 2012 and 2013 audited financial statements.

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The visit team then compared the general ledger report, filtered for 2013, to its turnover spreadsheet for 2013, with the turnover spreadsheet being approximately 1.1% higher.

ReneSola Jiangsu explained that the variance is due to the GAAP in China. In particular, it is required to report revenue in its audited financial statements at [REDACTED] level, whereas (as discussed section 4.1.6 above) some of its export sales are [REDACTED]. To reconcile its general ledger report to the turnover spreadsheet, ReneSola Jiangsu demonstrated that the following adjustments were necessary to the totals in the general ledger report:

- adding [REDACTED] (ReneSola Jiangsu provided a copy of its trial balance for ocean freight, marine insurance and sales commission to verify these amounts); [Confidential commercial terms]
- adding revenue from the sales of obsolete goods (ReneSola Jiangsu provided accounting vouchers for these sales); and
- deducting sales of waste products which did not raise an invoice (a listing of these sales was provided).

The source documents relating to the above adjustments were provided as part of Confidential Attachment EXP 5).

As a result of the adjustments, the general ledger report matched the turnover spreadsheet with no variance.

A similar exercise was undertaken for 2012 (thus covering the entire investigation period). ReneSola Jiangsu firstly demonstrated that the net operating income from the general ledger report for 2012 matched the 2012 audited financial statement. It then provided a monthly breakdown of the general ledger report for 2012 and demonstrated that the months of July 2012 to December 2012 inclusive came within approximately 1.6% of the turnover spreadsheet relating to the same period. After making the same adjustments as 2013, the general ledger report and the turnover spreadsheet reconciled with no variance.

Being satisfied that the turnover spreadsheet reconciled to audited financial statements, the visit team sought to reconcile the turnover spreadsheet to the Australian sales listing and the domestic sales listing.

ReneSola Jiangsu explained that the figures in the turnover spreadsheet were extracted from its ERP system. ReneSola Jiangsu ran a report and exported it to excel (ERP spreadsheet). The visit team confirmed that the total sales revenue in the ERP spreadsheet matched the turnover spreadsheet.

The visit team then attempted to reconcile ReneSola Jiangsu's Australian export sales and domestic sales listings to the ERP spreadsheet.

ReneSola Jiangsu explained that, in order to capture only the sales of PV modules or panels, it manually filtered the ERP spreadsheet by product type (which included PV modules or panels, cells, wafers and other). In order to differentiate between domestic sales, Australian sales and export sales to third countries, it manually filtered the ERP spreadsheet by customer name.

At the visit, ReneSola Jiangsu explained that it had picked up a minor error in the Australian sales listing subsequent to its exporter questionnaire response. The error

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resulted in one sale (immaterial in volume) being recorded as an Australian export sale because it was invoiced to an Australian customer, when in fact it was delivered to Israel. The visit team requested the relevant commercial invoice and confirmed that this sale was delivered to Israel (**Confidential Attachment EXP 7**). ReneSola Jiangsu reclassified this sale as a third country export sale and to ensure that the Australian export sales listing was accurate, manually added a column to show the final destination (delivery port) of the shipment taken from the respective bills of lading. Having done so, the Australian export sales listing was also able to be filtered by final destination.

The visit team noted that two shipments of relatively minor value were invoiced to an Australian customer with a final destination in [REDACTED]. The visit team randomly selected one of these sales and asked ReneSola Jiangsu to provide a commercial invoice for the sale (invoice number [REDACTED]) to prove the PV modules or panels were exported to [REDACTED]. The invoice confirmed that the sale was to [REDACTED] (**Confidential Attachment EXP 8**). Being satisfied those PV modules or panels were not exported to Australia, the visit team excluded the [REDACTED] sales from the Australian sales listing.

In comparing the values in the ERP spreadsheet to the Australian sales listing, the visit team observed a variance of approximately [REDACTED]% for the investigation period.

ReneSola Jiangsu explained that the difference was due to timing issues. For example, for export sales to Australia, there is sometimes a difference between the invoice date and the date that the sale is entered into its system. This is because the invoice date is the date PV modules or panels are sent to the customer, whereas sales are not until legal ownership passes to the customer, which for [REDACTED] sales may be up to a week later. To reconcile Australian sales in the ERP spreadsheet to the Australian sales listing, ReneSola Jiangsu:

- deducted sales recorded in ERP after the investigation period, which were invoiced during the investigation period;
- added amounts invoiced before the investigation period which were recorded in ERP during the investigation period; and
- deducted sales from ERP to Australian customers which did not have a final destination in Australia.

ReneSola Jiangsu provided a listing of the invoices relating to the sales adjustments listed above. The reconciliation resulted in no variance between the ERP spreadsheet and the Australian sales listing.

As an additional test for completeness of Australian export sales, the visit team sought to verify the sales revenue recorded in the general ledger to the sales revenue in the Australian sales listing for two particular companies, [REDACTED] and ReneSola Australia. ReneSola Jiangsu provided a report of its sales revenue ledger (**Confidential Attachment EXP 9**). For sales to [REDACTED], ReneSola Jiangsu filtered the sales ledger to exclude sales that weren't PV modules or panels and after adding ocean freight and marine insurance relating to CIF sales, the sub-ledger for [REDACTED] reconciled to the Australian sales listing with no variance.

A similar exercise was attempted for ReneSola Australia which resulted in a variance of less than [REDACTED]%. ReneSola Jiangsu was able to explain and reconcile the difference by

isolating two accounting vouchers for ReneSola Australia (**Confidential Attachment EXP 10**). The first of the accounting vouchers related to a small exchange gain. The second accounting voucher related to a transaction where one particular Australian customer ( ) inadvertently paid ReneSola Australia for an invoice when it should have paid ReneSola Jiangsu. As a result, ReneSola Jiangsu later had to debit the accounts receivable for ReneSola Australia and credit the accounts receivable for .

Being satisfied that the Australian export sales listing was complete, the visit team then reconciled the net domestic sales value in the turnover spreadsheet to the ERP spreadsheet, which resulted in no variance for the investigation period. ReneSola Jiangsu explained that for domestic sales, the reconciliation was easier because there was no need to account for sales and the subsequent timing differences as was the case for export sales.

#### 4.2.3 Renesola Zhejiang

The reconciliation of ReneSola Zhejiang's sales of PV modules or panels to audited financial statements followed much the same methodology as for ReneSola Jiangsu.

The visit team firstly attempted to match the consolidated turnover for ReneSola Zhejiang in its audited financial statements for 2012 and 2013 to the turnover of all products from Attachment A-6 of the exporter questionnaire response (turnover spreadsheet) by value.

To do so, ReneSola Zhejiang provided a report from its general ledger. ReneSola Zhejiang was able to show that the general ledger report, when filtered to 2012 and 2013, reconciled exactly to the consolidated turnover in its 2012 and 2013 audited financial statements.

The visit team compared the general ledger report filtered for 2013 to the turnover spreadsheet for 2013 and a variance of % was observed. As was the case with ReneSola Jiangsu, the variance was due to the GAAP in China, in particular the requirement to report revenue in the financial statements at level. ReneSola Zhejiang reconciled the general ledger report to the turnover spreadsheet by making the following adjustments to the general ledger report:

- adding ocean freight and marine insurance relating to sales;
- adding back revenue from defective goods;
- adjusting for exchange gain/loss; and
- deducting sales of waste products which did not raise an invoice.

Having completed this reconciliation, there was no variance between the general ledger and the turnover spreadsheet for ReneSola Zhejiang. A similar exercise was undertaken for 2012 (thus covering the entire investigation period) with no variance between the general ledger and turnover spreadsheet. Source documents relating to the above adjustments were provided as Confidential Attachment EXP 6.

Being satisfied that the turnover spreadsheet reconciled to audited financial statements, the visit team sought to verify the turnover spreadsheet to ReneSola Zhejiang's Australian sales listing and domestic sales listing.

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ReneSola Zhejiang ran a report from ERP and exported it to excel (ERP spreadsheet). The visit team confirmed the net sales values in the ERP spreadsheet matched the turnover spreadsheet.

The visit team then attempted to reconcile ReneSola Zhejiang's Australian export sales and domestic sales listings to the ERP spreadsheet. As was the case for ReneSola Jiangsu, ReneSola Zhejiang filtered the ERP spreadsheet by product type, customer and final destination. ReneSola Zhejiang explained that sales to one particular trader in China, [REDACTED] had been excluded from the domestic sales listing as the shipments have a final destination of Ukraine. ReneSola Zhejiang was aware of this because it delivered the PV modules or panels to the relevant port in China. ReneSola Zhejiang provided documents to verify one of [REDACTED] sales were to Ukraine (**Confidential Attachment EXP 11**).

After taking this into account, the values in the ERP spreadsheet reconciled to the Australian export sales listing and domestic sales listing with no variance over the investigation period.

### 4.2.4 Completeness and relevance of sales –conclusion

Through the process outlined above, the visit team was able to trace the net sales value for PV modules or panels provided in the exporter questionnaire response for ReneSola Jiangsu and ReneSola Zhejiang through internal sales reports to the respective audited financial statements. The visit team is satisfied that the sales listings provided in the exporter questionnaire response for ReneSola Jiangsu and ReneSola Zhejiang is relevant and complete.

### 4.3 Verification of export sales to source documents

As discussed at Section 4.1, in its exporter questionnaire response, ReneSola Jiangsu and ReneSola Zhejiang provided a detailed Australian export sales listing for PV modules or panels on a line by-line basis. The export sales listing included the following information:

- customer name;
- level of trade;
- model, product and internal product code;
- type of cell, e.g. whether mono or poly;
- invoice and order number;
- bill of lading number;
- invoice date, delivery date and date of sales in accounting system;
- shipping terms;
- payments terms;
- quantity (both in watts and pieces);
- gross and net invoice value (in actual currency and also a conversion to RMB);
- marine insurance;
- ocean freight (in actual currency and also converted to RMB);
- bank charges;
- packing cost;
- credit cost; and

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- inland transport cost.

As part of its exporter questionnaire response, ReneSola Jiangsu provided source documentation for two Australian export sales transactions (**Confidential Attachment EXP 12**). Prior to the visit, the visit team reconciled the source documents to ReneSola Jiangsu's Australian export sales listing.

The visit team also selected an additional ■ export sales transactions (covering all products exported to Australia over different quarters during the investigation period) from ReneSola Jiangsu's Australian export sales listing and one export sale transaction from the limited shipments by ReneSola Zhejiang to Australia during the investigation period, for verification to source documents.

The visit team requested ReneSola Jiangsu and ReneSola Zhejiang to provide the following commercial documents in relation to each selected export sales transaction:

- purchase order;
- order confirmation;
- commercial invoice;
- evidence of payment;
- inland freight costs;
- packing list;
- bill of lading;
- ocean freight;
- associated port handling and clearance charges invoice (where applicable); and
- evidence of payment for exportation costs.

ReneSola Jiangsu and ReneSola Zhejiang provided the source documents which form **Confidential Attachment EXP 13**.

Using the source documents, the visit team verified the customer names, product and model codes, invoice dates, currency, invoice values, shipping terms and quantities (in watts and pieces) of each selected export sale transaction to the Australian export sales listings for ReneSola Jiangsu and ReneSola Zhejiang. No variances in the invoiced amounts were observed.

ReneSola Jiangsu explained that one of the selected Australian export transactions for ReneSola Jiangsu, chosen by the visit team for its unusually low unit price, was a sample of two PV modules sent to Australia together with a larger shipment. The visit team noted that this was an isolated transaction of immaterial volume and excluded it from the Australian export sales listing.

The verification process for specific exportation expenses and evidence of payment for the PV modules or panels is discussed below (Sections 4.3.1 to 4.3.5).

### 4.3.1 Ocean freight

ReneSola Jiangsu explained that ocean freight in the Australian sales listings is the actual expense incurred for each ■ transaction in ■.

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ReneSola Jiangsu stated that [REDACTED] of the shipments originally classified as [REDACTED] was discovered to be [REDACTED] when no amount could be found for ocean freight in the Australian sales listing. ReneSola Jiangsu provided a commercial invoice and bill of lading to verify that the sale was [REDACTED] (**Confidential Attachment EXP 14**).

Through the source documents, the visit team was able to reconcile the invoiced amounts for ocean freight in [REDACTED] for each selected [REDACTED] Australian export transaction.

The visit team noted that the ReneSola Jiangsu had applied an incorrect conversion of ocean freight from [REDACTED] to RMB for the few sales which were invoiced in [REDACTED]. ReneSola Jiangsu updated the Australian export sales listing to rectify this issue.

### 4.3.2 Handling and inland transport

ReneSola Jiangsu explained that 'handling and other' expenses in the Australian sales listing includes inland transport and is the actual expenses incurred for each transaction. Through the source documents, the visit team reconciled the handling and other expenses incurred for each selected Australian export transaction.

### 4.3.3 Bank charges

ReneSola Jiangsu explained that bank charges are incurred on export sales but not domestic sales because there are fees incurred for transactions in foreign currencies. ReneSola Jiangsu explained that in its exporter questionnaire response, it had incorrectly allocated the bank charges to the respective Australian sales listings due to a double counting error. This error was corrected in the revised Australian export sales listings.

To verify the bank charges, ReneSola Jiangsu provided a bank charge summary from its general ledger (**Confidential Attachment EXP 15**). ReneSola Jiangsu allocated the bank charges as a proportion of all payments it received in a foreign currency during the investigation, which worked out as [REDACTED]% of sales. The visit team considers that the allocation is reasonable and was able to reconcile the bank charges from the general ledger to the revised Australian sales listings.

### 4.3.4 Marine insurance

ReneSola Jiangsu stated that it has a global marine insurance policy which attracts a premium based on each individual export shipment. In the Australian export sales listings, marine insurance was calculated as [REDACTED]% x [REDACTED]% of the [REDACTED] invoice value. The visit team requested a copy of the marine insurance policy (**Confidential Attachment EXP 16**) and noted a minor error in the calculation, such that the rate should have been calculated as [REDACTED]% x [REDACTED]% of the [REDACTED] invoice value. To rectify this issue, ReneSola Jiangsu updated the Australian sales listing.

### 4.3.5 Credit costs

ReneSola Jiangsu advised that it calculated the cost of providing credit for its Australian export sales listings based on the 6 month US LIBOR ratio. The visit team considers it more reasonable to base the credit costs on the actual short term borrowing rates incurred by ReneSola Jiangsu (see section 8.2.4 below).



The visit team also noted that there are a variety of different credit terms and that the credit terms were not able to be verified from the source documents provided initially. As a result, the visit team asked ReneSola Jiangsu to provide evidence to support the payment terms. ReneSola Jiangsu provided contracts and emails to evidence the payments terms (**Confidential Attachment EXP 17**). The visit team was able to verify the credit terms for the selected sales from ReneSola Jiangsu to Australian customers, however noted that the payment terms for the selected sale by ReneSola Zhejiang was incorrectly recorded as ■ days in its Australian sales listing, when it should have been ■ days. Given this was one of only a few transactions by ReneSola Zhejiang to Australia during the investigation period, the visit team is satisfied that this was an isolated error and adjusted the Australian export sales listing for ReneSola Zhejiang accordingly.

#### **4.3.6 Accuracy of Australian export sales – conclusion**

After taking into account adjustments to ReneSola Jiangsu's Australian export sales listing (as discussed in the preceding sections), the visit team considers that ReneSola Jiangsu's and ReneSola Zhejiang's Australian export sales listings are an accurate record of the sales of PV modules or panels to Australia during the investigation period.

#### **4.4 Treatment of ReneSola Jiangsu and ReneSola Zhejiang as a single entity**

As initially outlined in section 2.2 above, due to the circumstances of the sale of PV modules or panels manufactured by ReneSola Jiangsu and sold by ReneSola Zhejiang, the visit team considers it appropriate to treat the two entities as one for the purpose of calculating a dumping margin.

Where entities are 'collapsed' the actions of one member of the entity are taken to represent the actions of the whole. The issue of considering multiple entities as a single entity for the purpose of calculating dumping margins was considered by a World Trade Organisation dispute settlement panel dealing with the case of Korea – Anti-Dumping Duties on Imports of Certain Paper from Indonesia.<sup>1</sup>

In that WTO dispute settlement panel, the panel stated:

*"In our view, in order to properly treat multiple companies as a single exporter or producer in the context of its dumping determinations in an investigation, the IA has to determine that these companies are in a relationship close enough to support that treatment."*

It also stated that entities could be treated as a single entity where "the structural and commercial relationship between the companies in question is sufficiently close to be considered as a single exporter or producer."

The panel considered that common management and ownership are indications of a close legal and commercial relationship and such companies "could harmonize their commercial activities to fulfil common corporate objectives."

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<sup>1</sup> WT/DS312/R



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The Commission's Dumping and Subsidy Manual outlines circumstances in which related producers and selling entities may be 'collapsed' and treated as one entity. The manual describes circumstances where the producer or exporter is related to a separate entity which undertakes the domestic sales functions on behalf of the corporate group.

In this instance, ReneSola Jiangsu is wholly owned by ReneSola Zhejiang. ReneSola Jiangsu manufactures the PV modules or panels which are sold on the domestic and export markets by ReneSola Jiangsu and ReneSola Zhejiang. Sales of the PV modules or panels by ReneSola Zhejiang are also delivered by ReneSola Jiangsu from its warehouses. During the verification visit it, was explained that the arrangement whereby ReneSola Jiangsu manufacture the PV modules or panels on behalf of ReneSola Zhejiang was set up for the purpose of ReneSola Zhejiang accessing financing from banks.

One exporter questionnaire response was submitted by ReneSola Jiangsu, providing relevant information and data about the entire domestic and export manufacture and sales process. This included the provision of information by ReneSola Jiangsu and data on behalf of ReneSola Zhejiang. Similarly, during the exporter verification visit, information was provided to the visit team relating to activities undertaken by both ReneSola Jiangsu and ReneSola Zhejiang. The visit team notes that staff from ReneSola Zhejiang attended the visit at ReneSola Jiangsu's premises.

The interlinked nature of the two companies was also highlighted in ReneSola Jiangsu's explanation that whilst ReneSola Jiangsu purchases raw materials from unrelated suppliers, the supply is made through ReneSola Zhejiang (see section 5.3.2 below).

Considering the above detailed close structural and commercial relationships between ReneSola Jiangsu and ReneSola Zhejiang, the visit team considers it is appropriate to treat the two companies as a single entity and combine ReneSola Jaingsu's and ReneSola Zhejiang's export sales spread sheets for the purpose of calculating a dumping margin.

### 4.5 The exporter

The Commission will generally identify the exporter as:

- a principal in the transaction located in the country of export from where the goods were shipped who gave up responsibility by knowingly placing the goods in the hands of a carrier, courier, forwarding company, or their own vehicle for delivery to Australia; or
- a principal will be a person in the country of export who owns, or who has previously owned, the goods but need not be the owner at the time the goods were shipped.

Where there is no principal in the country of export the Commission will normally consider the exporter to be the person who gave up responsibility for the good as described above.

The visit team considers that ReneSola Jiangsu and ReneSola Zhejiang as a single entity is the exporter of PV module or panel during the investigation period, as ReneSola Jiangsu or ReneSola Zhejiang:

- is the manufacturer of the PV modules or panels;
- sets the price for the sale of the PV modules or panels;
- owns the PV modules or panels at the time prior to export;
- arranges delivery to the port of export (and is listed as the supplier on the bill of lading);
- is the principal in the country of export from where the PV modules or panels are knowingly placed in the hands of the freight forwarder for delivery to Australia; and
- sent the PV modules or panels for export to Australia and was aware of the identity of the purchaser.

#### 4.6 The importer

For all export sales to Australia, the visit team considers that the Australian customers listed on the commercial invoices and respective bills of lading are the importers of the PV modules or panels at the time of importation and therefore are the importers of the PV modules or panels exported by ReneSola Jiangsu during the investigation period.

#### 4.7 Arm's length

The visit team notes that the importer visit report for ReneSola Australia found that purchases of the PV modules or panels by ReneSola Australia from ReneSola Jiangsu and ReneSola Zhejiang were not arm's length transactions.<sup>2</sup> Based on this assessment, the importer visit report recommended that export price could be determined under subsection 269TAB(1)(b) and (c) of the Act (as a deductive export price).

However, an analysis of the selling prices from ReneSola Jiangsu to Australian customers found that the sales from ReneSola Jiangsu to ReneSola Australia to be consistent with its sales to unrelated Australian customers and reflected ReneSola Australia as a major customer. Therefore, the visit team has formed the view that although ReneSola Jiangsu and ReneSola Australia are related companies, the export prices are at arm's length prices. The visit team's analysis of selling prices is at **Confidential Attachment EXP 18**.

Furthermore, the visit team found no evidence that:

- there is any consideration payable for or in respect of the PV modules or panels other than their price; or
- the price is influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; or
- the buyer, or an associate of the buyer, will directly or indirectly, be reimbursed, compensated or otherwise receive a benefit for, or in respect of, whole or any part of the price.

Accordingly, the visit team considers that all export sales to Australia during the investigation period were arm's length transactions.

#### 4.8 Export price – preliminary assessment

The visit team considers that:

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<sup>2</sup> No. 97 on the public record

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- the PV modules or panels have been exported to Australia otherwise than by the importer;
- the PV modules or panels have been purchased by the importer from the exporter; and
- the purchases of the PV modules or panels by the importer were arm's length transactions.

In relation to all exports by ReneSola Jiangsu and ReneSola Zhejiang, as a collapsed entity, to Australian customers, the visit team recommends that the export price be determined under subsection 269TAB(1)(a) of the Act, as the price paid by the importer less transport and other costs arising after exportation.

Export price calculations are at **Confidential Appendix 1**.

## 5 COST TO MAKE & SELL

### 5.1 General

In its exporter questionnaire response, ReneSola Jiangsu provided a spreadsheet detailing its monthly cost to make and sell (CTMS) PV modules or panels by product code over the investigation period. The spreadsheet contained the CTMS of PV modules or panels manufactured by ReneSola Jiangsu broken down into the following items:

- Material costs (PV cell)
- Other material costs
- Direct labour;
- Manufacturing overheads; and
- Packaging.

At the start of the verification visit, ReneSola Jiangsu provided us with a revised CTMS spreadsheet (**Confidential Attachment CTMS 1**). It explained that in preparing for the verification visit, it discovered a calculation error which resulted in costs being overstated. It advised that the magnitude of the error was less than █% to the overall cost of production.

### 5.2 Verification of costs up to audited financial statements

We sought to verify the completeness and relevance of the cost to make (CTM) data provided by ReneSola Jiangsu in its exporter questionnaire response by reconciling it to its audited financial accounts. ReneSola Jiangsu provided us with a workbook that listed all the adjustments and management reports to enable a complete reconciliation of the total CTM to the audited accounts (**Confidential Attachment CTMS 2**). Nonetheless, we attempted to compare the cost of goods sold as reported in the audited financial statements directly with the cost spreadsheet. ReneSola Jiangsu provided us with a copy of COGS for the period of January 2012 to June 2012 (**Confidential Attachment CTMS 3**) and together with the 2012 and 2013 audited profit and loss statements provided in the exporter questionnaire response, we calculated the COGS for the investigation period. We then deducted the cost of goods relating to products other than PV modules or panel (e.g. cells) as reported in its inventory sub-ledger to attain a COGS for PV modules or panel during the investigation period. We then compared the COGS for PV modules or panels with the total CTM in the cost spreadsheet and found an immaterial variance of less than █% (**Confidential Attachment CTMS 4**).

Having reconciled the cost spreadsheet to audited financial statements, we are satisfied that it is complete and relevant.

### 5.3 Verification of costs down to source documents

We sought to verify the accuracy of the CTM data by reconciling it down to source documents. ReneSola Jiangsu stated that it uses a series of spreadsheets to calculate the cost of PV modules or panels. It explained that it would complete this calculation on a monthly basis and upload the costs into its accounting system. We requested, and ReneSola Jiangsu provided, copies of the monthly cost calculation spreadsheets for the entire investigation period (**Confidential Attachment CTMS 5**). We noted that for each

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month, there are three separate cost spreadsheets, which were PV modules or panels manufactured by ReneSola Jiangsu, manufactured by another company on behalf of ReneSola Jiangsu (i.e. tolling) and purchased fully assembled by ReneSola Jiangsu. Our analysis indicated that [REDACTED]

[REDACTED] (Confidential Attachment CTMS 6).

We selected ReneSola Jiangsu's cost of manufacturing product codes [REDACTED] in August 2012 for further verification. We note that these [REDACTED] models account for over [REDACTED]% of exports of the goods to Australia and [REDACTED]% of domestic sales during the investigation period.

### 5.3.1 Production volume

We requested ReneSola Jiangsu demonstrate the source of the production volumes reported in its cost spreadsheet. ReneSola Jiangsu referred us to the 'Modules In' tab of its cost calculation spreadsheets which showed detailed manufacturing outputs for the month, which included the date, product code and quantity in both units and watts. It explained that its production staff inputs data on PV modules or panels manufactured into its EPR system and this spreadsheet is a report generated from the system. ReneSola Jiangsu was able to demonstrate that by filtering for the specific product codes, the production volume in this report matched the figures in the cost spreadsheet (confidential attachment CTMS 7).

### 5.3.2 PV cells

We sought to verify the cost of the PV cells, which is the main material used in the production of PV modules or panels. ReneSola Jiangsu again referred us to the 'Modules In' tab of its cost calculation spreadsheets and by filtering for the specific product code, we were able to match the total cell costs to the cost spreadsheet. It demonstrated how the monthly cost of cells was calculated based on the values of the module opening work-in-progress ('Opening WIP Cost' tab), ending work-in-progress ('Ending WIP Cost' tab) and cell inputs ('Material Summary' tab). ReneSola Jiangsu then demonstrated the cell input values based on the cell open, closing and transferred from inventory values.

We sought to verify the reasonableness of unit value of cells used in the calculation by comparing the values to the unit cost of cells purchased. Using the cell purchase spreadsheet provided in the exporter questionnaire response, we found that the unit prices were consistent with the values in the cost spreadsheet. We then selected [REDACTED] transactions from the cell purchase spreadsheet for further verification down to commercial invoices and requested proof of payment for [REDACTED] transactions. ReneSola Jiangsu provided the relevant source documents (confidential attachment CTMS 8) and we were able to reconcile the amounts to the cell purchase spreadsheet.

In the CTMS spreadsheet, ReneSola Jiangsu applied a discount to the cost of cells of [REDACTED]%. ReneSola Jiangsu advised that the discount relates to [REDACTED]

[REDACTED]. [Confidential commercial information] ReneSola Jiangsu provided us with ReneSola Zhejiang's sales revenue and COGS of PV cells to substantiate the profit margin (confidential

**attachment CTMS 9)** and we were able to verify the proportion of PV cell purchases from the PV cell purchase spreadsheet.

ReneSola Jiangsu argued that ReneSola Zhejiang's profit margin on sales of PV cells to ReneSola Jiangsu should be excluded from the costs due to the integrated nature of the two companies. It stated that ReneSola Zhejiang acts simply as an intermediary in the purchase of PV cells, which are delivered directly from the manufacturer to ReneSola Jiangsu's factory in Yixing. ReneSola Jiangsu provided us with delivery notices as evidence that PV cells purchased through ReneSola Zhejiang are delivered directly to ReneSola Jiangsu (**confidential attachment CTMS 10**).

Having regard to the evidence that PV cells are delivered directly to ReneSola Jiangsu's factory, and our treatment of collapsing ReneSola Zhejiang and ReneSola Jiangsu into a single entity (see sections 2.2 and 4.4 above), we consider ReneSola Jiangsu's claim for the discount to the cost of PV cells to be reasonable.

### 5.3.3 Other materials

ReneSola Jiangsu advised that the other material cost figure in the CTMS spreadsheet comprises the cost of:

- Glass;
- EVA;
- Back sheet;
- Silicon Glue;
- Aluminium Frame;
- Ribbon;
- Junction box; and
- Packing materials.

ReneSola Jiangsu advised that the cost of other materials for each month was calculated using the same methodology as PV cells based on the module opening work-in-progress, ending work-in-progress and input values, which we were able to follow.

We then selected glass and aluminium frame, which accounts for between 35% and 50% of the value of other material costs, depending on the model, for further verification down to source documents. ReneSola Jiangsu provided us with a spreadsheet listing its glass and aluminium frame purchases for August 2012 and we analysed the unit purchase prices and found it to be consistent with the values in the cost spreadsheets. We selected several glass and aluminium frame invoice numbers and requested copies of those invoices (**confidential attachment CTMS 11**). We were then able to reconcile the values from the invoices to the glass and aluminium purchase spreadsheet.

### 5.3.4 Direct labour

ReneSola Jiangsu advised that it allocates direct labour costs equally across all models based on the units of PV modules or panels manufactured each month, which we were able to verify in the 'FG Cost' tab of the cost calculation spreadsheets. We consider this allocation methodology reasonable. ReneSola Jiangsu provided us with its August 2012 direct labour sub-ledger from its accounting system (**confidential attachment CTMS 12**).

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and we were able to reconcile the total direct labour cost reported in its ledger to the sum of the direct labour expenses in the cost calculation workbook.

### 5.3.5 Manufacturing overheads

ReneSola Jiangsu stated that manufacturing overheads consists of water, electricity, steam, depreciation and other manufacturing overheads. It advised that, as with direct labour costs, it allocates manufacturing overheads based on units of PV modules or panels manufactured each month, which we also consider reasonable. ReneSola Jiangsu provided us with its August 2012 manufacturing overhead sub-ledgers from its accounting system (**confidential attachment CTMS 13**) and we were able to reconcile the total manufacturing overhead cost reported in its ledger to the sum of the manufacturing overhead expenses in the cost calculation workbook.

We then selected depreciation for further verification down to source documents and ReneSola Jiangsu provided us with its depreciation schedule for August 2012 (**confidential attachment CTMS 14**), which also identified whether the asset related to administration, selling, research & development or manufacturing. ReneSola Jiangsu then provided us with its August 2012 manufacturing depreciation sub-ledger and indicated which asset related to which manufacturing department (**confidential attachment CTMS 15**). We were then able to reconcile the total depreciation cost associated with the PV modules workshops from the sub-ledger to the cost calculation worksheets.

### 5.4 Selling, general and administration (SG&A) expenses

ReneSola Jiangsu allocated selling, general and administration (SG&A) expenses to the costs as a proportion of revenue over the investigation period and provided the relevant ledgers to support its calculation (**confidential attachment CTMS 16**). It advised that it made the following adjustments to the SG&A calculation:

- Removed R&D expenses and income associated with a related company.
- Deducted bank charges, packaging costs, handling expenses and freight to avoid double count.

We then selected depreciation for further verification and ReneSola Jiangsu was able to demonstrate how the SG&A depreciation expenses for August 2012 reconciled from the depreciation schedule (**confidential attachment CTMS 14**) to the SG&A amount recorded in its accounts (**confidential attachment CTMS 17**).

### 5.5 Costs to make and sell – conclusion

Having verified ReneSola Jiangsu's CTMS PV modules or panels up to audited financial accounts and down to source documents, we are satisfied that it is complete, relevant and accurate.

ReneSola Jiangsu's verified CTMS spreadsheet is at **confidential appendix 2**.



## 6 DOMESTIC SALES

### 6.1 General

As part of its exporter questionnaire response, ReneSola Jiangsu provided a flowchart outlining its domestic sales process (**Confidential Attachment DOM 1**).

ReneSola Jiangsu stated that it has no formal distributor agreement with any of its domestic customers. However, a [REDACTED] proportion of ReneSola Jiangsu's domestic sales are to ReneSola Zhejiang [REDACTED] which are then on sold by ReneSola Zhejiang to unrelated customers. For those sales:

- ReneSola Jiangsu manufactures the PV modules or panels.
- ReneSola Jiangsu invoices ReneSola Zhejiang.
- ReneSola Zhejiang invoices the customer.
- ReneSola Jiangsu delivers the PV modules or panels to the customer from its warehouse.

ReneSola Jiangsu stated that there is a small mark-up [REDACTED] of profit for its sales to ReneSola Zhejiang.

During the investigation period, ReneSola Jiangsu also sold PV modules or panels to a related trading company, [REDACTED]. However, those PV modules or panels were unable to be sold by [REDACTED] and were returned to ReneSola Jiangsu.

### 6.2 Domestic sales process

ReneSola Jiangsu explained its domestic sales process as follows:

- the customer contacts ReneSola Jiangsu by phone or email with a purchase order;
- ReneSola Jiangsu's sales team reviews the purchase order and negotiates [REDACTED] with the customer. [REDACTED]  
[REDACTED] [Confidential commercial information] ReneSola Jiangsu stated that it does not maintain domestic price lists;
- once agreement is reached [REDACTED], ReneSola Jiangsu drafts a sales contract which is sent to the customer for approval;
- ReneSola Jiangsu arranges delivery of the PV modules or panels to the customer;
- for each domestic sale, the selling price has to be approved by the CEO and the vice president of the sales department. The sales terms have to be reviewed and approved by the legal department, and the payment terms have to be reviewed and approved by the financial vice president.

#### 6.2.1 Discounts, rebates and allowances

ReneSola Jiangsu stated that no discounts, rebates or allowances are given to domestic customers. The visit team found no evidence to suggest otherwise.



### 6.2.2 Date of sale

ReneSola Jiangsu and ReneSola Zhejiang record the date of sale for domestic sales as the order date. The visit team noted that there was sometimes a difference between the order date and the invoice date. ReneSola Jiangsu explained that this was because the PV modules or panels are not invoiced until when the final delivery is made. The visit team is satisfied that the order date is the most appropriate domestic date of sale to compare to the export date of sale. The visit team considers that over the 18 month investigation period, the date of sale used does not result in a material difference to the dumping margin calculations.

Because the date of sale was not available in the source documents initially provided, the visit team requested ReneSola Jiangsu provide an order confirmation for a selected sale to verify the date of sale was correctly recorded. ReneSola Jiangsu provided an order confirmation for sales order SO1209190242 (**Confidential Attachment DOM 2**), which the visit team reconciled to the domestic sales listing.

## 6.3 Domestic sales verification

### 6.3.1 Completeness and relevance

The verification of ReneSola Jiangsu's and ReneSola Zhejiang's domestic sales listings to the audited financial statements is outlined above at section 4.2 above.

### 6.3.2 Verification of domestic sales to source documents

In its exporter questionnaire response, ReneSola Jiangsu and ReneSola Zhejiang provided detailed domestic sales listings. At the visit, ReneSola Jiangsu and ReneSola Zhejiang provided revised domestic sales listings (**Confidential Attachment DOM3 and 4** refers), which included the following information:

- customer name (in Chinese and English);
- level of trade;
- model, product and internal product code;
- type of cell, e.g. whether mono or poly;
- invoice and order number;
- invoice date, delivery date and date of sales in accounting system;
- shipping terms;
- quantity (both in watts and pieces);
- gross and net invoice value;
- packing cost;
- credit cost; and
- handling and other costs.

As part of its exporter questionnaire response, ReneSola Jiangsu provided source documents relating to two domestic sales. The visit team was able to reconcile these source documents to the domestic sales listing.

Prior to the visit, the visit team selected [REDACTED] transactions from ReneSola Jiangsu's and ReneSola Zhejiang's domestic sales listings and requested ReneSola Jiangsu and

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ReneSola Zhejiang to provide the following supporting commercial documents in relation to the selected invoices:

- purchase order;
- sales contract;
- commercial invoice;
- evidence of payment;
- inland freight invoice and evidence of payment; and
- discount and rebate source documents (where applicable).

These documents were provided and are at **Confidential Attachment DOM 5**.

The visit team traced the details in the source documents to the domestic sales listings and found no discrepancies in relation to products, customers, dates, prices and quantities. The following observations are noted about specific aspects of the domestic sales listings.

### 6.3.3 Inland freight

ReneSola Jiangsu stated that unlike export sales, its system does not track the cost of inland freight individually for each domestic sales transaction. However its system does track whether an inland freight expense is related to a domestic sale or export sale.

To calculate a weighted average unit domestic inland freight cost, ReneSola Jiangsu first apportioned the total inland freight applicable to cells, wafers and PV modules or panels by weight. ReneSola Jiangsu was able to do this because it had previously calculated the unit weight per watt for cells, wafers and PV modules or panels in a recent anti-dumping investigation conducted by the USA. ReneSola Jiangsu demonstrated that the unit weights were correct by providing packing lists and commercial invoices with the weights and wattage of cells, wafers and PV modules or panels.

To verify the unit inland freight cost, ReneSola Jiangsu provided a report from its general ledger, which listed all domestic transport costs. The visit team excluded transport costs which did not apply to sales of the PV modules or panels and was able to reconcile the unit cost from the domestic sales listing. As a result, the visit team is satisfied that domestic inland transport costs are allocated on a reasonable basis. Documents for the verification of domestic inland freight are at **Confidential Attachment DOM 6**.

### 6.3.4 Credit costs

ReneSola Jiangsu stated that although it does not officially provide credit to its domestic customers, it provides a rolling line of credit to its domestic customers. Therefore, to calculate average credit term for domestic sales, ReneSola Jiangsu and ReneSola Zhejiang calculated an accounts receivable turnover ratio.

ReneSola Jiangsu and ReneSola Zhejiang ran a report from the respective general ledgers which showed the accounts receivable at 1 July 2012 and 31 December 2013 (**Confidential Attachment DOM 7**). An average age of those two amounts was divided by domestic sales receipts for the investigation period and multiplied by 360.

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The visit team adjusted this calculation to reflect that the investigation period was 18 months and not 12 months. Having done so, the visit team considers the domestic credit costs are reasonable.

### 6.3.5 Accuracy of sales– conclusion

The visit team considers that ReneSola Jiangsu and ReneSola Zhejiang's domestic sales listings (as discussed at in the preceding sections), are an accurate record of their sales of PV modules or panels on the domestic market in China.

## 6.4 Pricing between ReneSola Jiangsu and ReneSola Zhejiang

As discussed in Section 4.4, the visit team considers it necessary to collapse the sales between ReneSola Jiangsu and ReneSola Zhejiang for the purposes of calculating dumping margins and only had regard to sales to unrelated domestic customers. Specifically, we combined ReneSola Jiangsu's and ReneSola Zhejiang's domestic sales spreadsheets and excluded transactions from ReneSola Jiangsu to ReneSola Zhejiang.

The visit team attempted to reconcile ReneSola Jiangsu's sales to ReneSola Zhejiang with ReneSola Zhejiang's domestic and Australian sales and noted a ■% variation, in terms of total watts sold during the investigation period.

The visit team used ReneSola Zhejiang's ERP spreadsheet to add back sales by ReneSola Zhejiang to customers in third countries, which consisted of sales to ReneSola Deutschland in Germany. Having done so, ReneSola Jiangsu's sales to ReneSola Zhejiang reconciled with an immaterial variance to ReneSola Zhejiang's sales. Accordingly, the visit team is satisfied that collapsing the sales listings of ReneSola Jiangsu and ReneSola Zhejiang would result in a complete account of sales of PV modules or panels on the Chinese domestic market.

The visit team asked ReneSola Jiangsu to provide evidence that the margin applied between ReneSola Jiangsu and ReneSola Zhejiang was sufficient to cover any SG&A costs incurred for sales by ReneSola Zhejiang. ReneSola Jiangsu stated that it did not apply a flat profit margin to its sales to ReneSola Zhejiang. It also stated that there is basically no SG&A costs incurred by ReneSola Zhejiang in its sales of PV modules or panels, other than minor overheads in collecting payment, because all PV modules or panels are delivered by ReneSola Jiangsu. ReneSola Jiangsu also explained that it would be difficult to match individual sales made by ReneSola Jiangsu to ReneSola Zhejiang to sales by ReneSola Zhejiang as the sales by ReneSola Zhejiang may occur in different months and for different quantities.

Acknowledging these difficulties, the visit team selected a sample domestic sale by ReneSola Zhejiang and asked it to demonstrate it was delivered by ReneSola Jiangsu. ReneSola Jiangsu provided its warehouse out list and delivery slips for the relevant month (**Confidential Attachment DOM 8**), confirming delivery by ReneSola Jiangsu.

The visit team then filtered ReneSola Jiangsu's domestic sales listing to include only sales from ReneSola Jiangsu to ReneSola Zhejiang for the same model and month as the selected sale and calculated an average unit selling price. The margin between the unit selling price by ReneSola Jiangsu to ReneSola Zhejiang and the unit selling price for the selected sale by ReneSola Zhejiang was approximately ■%. The visit team also

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compared the unit selling prices of ReneSola Jiangsu to ReneSola Zhejiang to unit selling prices by ReneSola Zhejiang over the whole investigation period and found that unit selling prices by ReneSola Zhejiang were on average approximately [REDACTED] (**Confidential DOM9**).

As a result of the above analysis, the visit team is satisfied that the margin applied to sales made through ReneSola Zhejiang was sufficient to cover any SG&A costs incurred by ReneSola Zhejiang in the sale of PV modules or panels.

### 6.5 Arms' length

In respect of domestic sales during the investigation period, the visit team found no evidence that:

- there is any consideration payable for or in respect of the PV modules or panels other than their price; or
- the price is influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; or
- the buyer, or an associate of the buyer, will directly or indirectly, be reimbursed, compensated or otherwise receive a benefit for, or in respect of, whole or any part of the price.

The visit team considers that all domestic sales during the investigation period by ReneSola Jiangsu and ReneSola Zhejiang, as a collapsed entity, were arm's length transactions.

### 6.6 Ordinary course of trade

Section 269TAAD of the Act provides that if like goods are sold in the country of export at a price less than the cost of such goods and are unrecoverable within a reasonable period, they are taken not to have been paid in the ordinary course of trade (OCOT).

In order to test whether the domestic sales are in the OCOT, we first tested the profitability of each transaction individually by comparing the unit selling price to the corresponding quarterly weighted average CTMS for each model based on the product code. Where the volume of unprofitable sales exceeds 20% for the product code, we then tested the recoverability of the unprofitable sales by comparing the unit selling price to the corresponding weighted average CTMS over the whole of the investigation period. Those sales found to be unrecoverable were deemed not to be made in the OCOT.

The visit team found that, overall, [REDACTED]% of sales of PV modules or panels in the Chinese market were made in the OCOT.

### 6.7 Volume of domestic sales

Section 269TAC(2) of the Act provides that certain domestic sales may be unsuitable for use in determining normal values because of factors in the market. One such factor is where there is an absence, or low volume, of sales of like goods in the domestic market.

Low volume is defined in section 269TAC(14) of the Act as less than 5% of the total volume of goods under consideration that are exported to Australia.

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The visit team then tested individually whether the volumes of domestic sales made in OCOT for each model was at least ■% of the total volume of the comparable model exported to Australia using the model matching methodology outlined in section 3.3.2 above. The visit team found there were sufficient volumes of domestic sales made in the OCOT for three of four models of PV modules or panels exported to Australia.

For model DS (mono PV modules or panels with 72 cell pieces measuring 125mm), there was insufficient volumes of the comparable DS model sold on the domestic market during the investigation period. We then considered comparing the export volumes of the DS model to the domestic sales volumes of the other mono model, BS model, and found that there were also insufficient volumes. We did not consider it appropriate to compare a mono PV module or panel model to a poly PV module or panel, therefore, the visit team considers that for DS model PV modules or panels, there normal values cannot be ascertained under 269TAC(1) using domestic selling prices.

### 6.8 Profit

As discussed in section 6.7 above, for model DS, there were insufficient domestic sales of comparable models to ascertain normal values using domestic selling prices. Therefore, the visit team consider that normal values for model DS should be based on constructed costs and an amount for profit.

We calculated the profitability of domestic sales of PV modules or panels by comparing the selling price with the corresponding quarterly CTMS. In calculating the profit, we have only included domestic sales made in the ordinary course of trade<sup>3</sup>.

The profitability of domestic sales of like goods made in the ordinary course of trade during the investigation period, as a percentage of revenue, is ■%.

### 6.9 Domestic sales – conclusion

We found sufficient volumes of domestic sales of PV modules or panels for 3 export models that were arm's length transactions and sold at prices that were in the ordinary course of trade. For these models, we have are satisfied that the domestic selling prices are suitable of determining normal values under section 269TAC(1) of the Act.

The domestic sales spreadsheets, including OCOT tests and profit calculations, are at **confidential appendix 3**.

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<sup>3</sup> Regulation 181A(2)

## **7 THIRD COUNTRY SALES**

### **7.1 Verification of third country sales**

In its exporter questionnaire response, ReneSola Jiangsu and ReneSola Zhejiang provided a summary of PV modules or panels sold to third countries during the investigation period. This summary did not contain a line by line listing. However, following the verification of domestic and Australian export sales to audited financial statements (discussed at Chapter 4), the visit team was able to reconcile the total net sales value and volume of PV module sales to third countries through internal sales reports (ERP spreadsheets), general ledger reports and audited financial statements.

The visit team considers that it is in possession of sufficient verified information from the exporter questionnaire response and the visit to calculate normal values for PV modules or panels using domestic sales (as discussed in Chapter 7) or costs (as outlined in Chapter 5). For this reason, the visit team did not undertake a detailed verification of third country sales.

## 8 ADJUSTMENTS

### 8.1 General

In calculating dumping margins, the Commission will make adjustments to ensure that the normal value is comparable to the export price.

The visit team found that, while ReneSola Jiangsu and ReneSola Zhejiang exported PV modules or panels to Australia predominately at [REDACTED] shipping terms, it was able to calculate the export price and corresponding normal value at [REDACTED] level, which is the Commission's preferred approach.

### 8.2 Adjustments to the normal value

#### 8.2.1 Domestic inland freight

The visit team considers a downwards adjustment for domestic inland freight cost is required to ensure fair comparison to the export price. In the domestic sales listing, the domestic inland freight cost was calculated on a weighted average (per watt) basis and allocated to each transaction (refer to section 6.3.3 above).

#### 8.2.2 Export handling and other expenses

The visit team considers an upward adjustment to normal values based on the export handling and other expenses is necessary to ensure fair comparison to the export price. The visit team calculated a weighted average export handling and other expense of 0.032 RMB per watt reflecting the actual loading charges and inland freight costs and adjusted the normal value accordingly. Verification of this cost is detailed at section 4.3.2 above.

#### 8.2.3 Bank charges

The visit team considers an upward adjustment to normal values based on the export bank charges is necessary to ensure a fair comparison to the export price. The visit team calculated a weighted average bank charges expense of [REDACTED] RMB per watt and adjusted the normal value accordingly. Verification of this cost is detailed at section 4.3.3 above.

#### 8.2.4 Credit costs

As discussed in section 4.1.3 above, the visit team calculated export prices at cash terms. Therefore, a downwards adjustment to the normal value for the cost of credit was necessary to arrive at cash terms.

To calculate credit costs, ReneSola Jiangsu supplied an extract of its general ledger demonstrating its short term borrowing rates for RMB, [REDACTED] and [REDACTED]. The visit team calculated that the weighted average short term borrowing rate during the investigation period was [REDACTED]% for borrowings in RMB and used this as the basis for adjustment to normal values. In regards to export sales, ReneSola Jiangsu stated that it was more appropriate to use the short term borrowing rates applying to [REDACTED] and [REDACTED], which equated to [REDACTED]%, because this was the currency export sales were invoiced in. The visit team notes that the difference in the short term borrowing rates does not materially

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impact the level of credit cost adjustment and considers this approach reasonable in the circumstances.

The visit team's short term borrowing calculations are at **Confidential Attachment ADJ1**.

### 8.3 Adjustments – conclusion

The visit team is satisfied there is sufficient and reliable information to justify the following adjustments, in accordance with sections 269TAC(8) and (9) of the Act, and considers these adjustments necessary to ensure fair comparison of normal value and export price.

Adjustment type	Deduction/addition
Domestic inland freight	<b>Deduct</b> the domestic inland freight costs of x RMB per watt
Handling and other	<b>Add</b> a weighted average cost for export handling and other expenses (including inland transport)
Bank charges	<b>Add</b> a weighted average bank charge for export sales
Credit terms	<b>Deduct</b> to credit cost to arrive at with cash credit terms

Table2: Adjustment to normal value to ensure comparability to export price



## 9 NORMAL VALUE

The visit team found sufficient volumes of domestic sales of 3 PV module or panel models by ReneSola Jiangsu and ReneSola Zhejiang. The sales were arm's length transactions at prices in the OCOT. The visit team is therefore satisfied that prices paid in respect of domestic sales of PV modules or panels are suitable for assessing normal values under section 269TAC(1) of the Act.

In using domestic sales as the basis for normal values, the visit team considers that certain adjustments, in accordance with section 269TAC(8) of the Act are necessary to ensure comparability of normal values with export prices as outlined in Chapter 8.

In relation to export model DS where there were insufficient volumes of OCOT domestic sales (see section 6.7 above), we consider that it would be unsuitable to use domestic sales data to determine the normal value under section 269TAC(1) of the Act. Instead, we consider that normal values should be based on constructed costs and an amount for profit.

Normal values have been constructed using the cost to make the exported DS model plus SG&A on the assumption that the goods, instead of being exported, were sold domestically<sup>4</sup>. A rate of profit, as discussed in section 6.8 above, has been added using data related to the production and arm's length sales of like goods in the ordinary course of trade<sup>5</sup>.

In using costs as the basis for normal values, we consider that certain adjustments, in accordance with s. 269TAC(9), are necessary to ensure fair comparison of normal values with export prices as outlined in chapter 8.

The visit team's normal value calculations are at **Confidential Appendix 4**.

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<sup>4</sup> s. 269TAC(2)(c)

<sup>5</sup> Regulation 181A(2) of the *Customs Regulations 1926*

## 10 DUMPING MARGIN

The dumping has been assessed by comparing the weighted average export prices to the corresponding weighted average normal values for the investigation period. The dumping margin in respect of PV modules or panels exported to Australia by ReneSola Jiangsu and ReneSola Zhejiang, as a collapsed entity, for the investigation period is -0.3%.

The preliminary dumping margin calculations are at **Confidential Appendix5**.

## 11 APPENDICES AND ATTACHMENTS

<b>Confidential Appendix 1</b>	Export price
<b>Confidential Appendix 2</b>	CTMS
<b>Confidential Appendix 3</b>	OCOT and sufficiency tests
<b>Confidential Appendix 4</b>	Normal value
<b>Confidential Appendix 5</b>	Dumping margin calculation
<b>Confidential Attachment GEN 1</b>	Visit agenda
<b>Confidential Attachment GOODS 1</b>	Product code table
<b>Confidential Attachment EXP 1</b>	Australian export sales process
<b>Confidential Attachment EXP 2</b>	ReneSola Zhejiang's 2013 audited financial statements
<b>Confidential Attachment EXP 3</b>	Revised exporter questionnaire response appendices
<b>Confidential Attachment EXP 4</b>	Summary of revisions to exporter questionnaire response appendices
<b>Confidential Attachment EXP 5</b>	ReneSola Jiangsu completeness test reconciliation
<b>Confidential Attachment EXP 6</b>	ReneSola Zhejiang completeness test reconciliation
<b>Confidential Attachment EXP 7</b>	Invoice for export sale to [REDACTED]
<b>Confidential Attachment EXP 8</b>	Invoice for export sale to [REDACTED]
<b>Confidential Attachment EXP 9</b>	Trial balance for [REDACTED]
<b>Confidential Attachment EXP 10</b>	Reconciliation of general ledger to Australian export sales listing for ReneSola Australia
<b>Confidential Attachment EXP 11</b>	Commercial invoice for Ukraine sale
<b>Confidential Attachment EXP 12</b>	Source documents for Australian export sales provided in exporter questionnaire response

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<b>Confidential Attachment EXP 13</b>	Source documents for Australian export sales provided at visit
<b>Confidential Attachment EXP 14</b>	Australian export sale in [REDACTED] source documents
<b>Confidential Attachment EXP 15</b>	Bank charge summary
<b>Confidential Attachment EXP 16</b>	Marine insurance contract
<b>Confidential Attachment EXP 17</b>	Source documents evidencing Australian export sales payment terms
<b>Confidential Attachment EXP 18</b>	Arms' length analysis
<b>Confidential Attachment CTMS 1</b>	Revised CTMS spreadsheet
<b>Confidential Attachment CTMS 2</b>	Reconciliation of CTMS to audited accounts
<b>Confidential Attachment CTMS 3</b>	COGS for January to June 2012
<b>Confidential Attachment CTMS 4</b>	Variance between COGS and CTM
<b>Confidential Attachment CTMS 5</b>	Monthly cost calculation spreadsheets
<b>Confidential Attachment CTMS 6</b>	Analysis of cost between purchased, tolled and self-produced PV modules
<b>Confidential Attachment CTMS 7</b>	Production volume reconciliation
<b>Confidential Attachment CTMS 8</b>	PV cell purchase source documents
<b>Confidential Attachment CTMS 9</b>	ReneSola Zhejiang PV cell profit margin
<b>Confidential Attachment CTMS 10</b>	PV cell delivery notices
<b>Confidential Attachment CTMS 11</b>	Selected glass and aluminium frame invoices
<b>Confidential Attachment CTMS 12</b>	Direct labour sub-ledger
<b>Confidential Attachment CTMS 13</b>	August 2012 manufacturing overhead sub-ledgers
<b>Confidential Attachment CTMS 14</b>	Depreciation schedule for August 2012
<b>Confidential Attachment CTMS 15</b>	August 2012 manufacturing depreciation sub-ledger
<b>Confidential Attachment CTMS 16</b>	SG&A ledgers

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<b>Confidential Attachment CTMS 17</b>	August 2012 SG&A deprecation sub-ledgers
<b>Confidential Attachment DOM 1</b>	Domestic sales process
<b>Confidential Attachment DOM 2</b>	Sample sales order for ReneSola Jiangsu
<b>Confidential Attachment DOM 3</b>	Updated domestic sales listing for ReneSola Jiangsu
<b>Confidential Attachment DOM 4</b>	Updated domestic sales listing for ReneSola Zhejiang
<b>Confidential Attachment DOM 5</b>	Selected domestic sales source documents
<b>Confidential Attachment DOM 6</b>	Inland freight supporting documents
<b>Confidential Attachment DOM 7</b>	Accounts receivable general ledger screenshots
<b>Confidential Attachment DOM 8</b>	Proof of delivery for ReneSola Zhejiang sales
<b>Confidential Attachment ADJ1</b>	Short term borrowing calculations