



FILE NOTE

Investigation into certain crystalline silicon photovoltaic modules or panels, exported to Australia from the People's Republic of China

Record of email correspondence between the Anti-Dumping Commission and PwC Australia on behalf of True Value Solar Pty Ltd

From PwC Australia on behalf of True Value Solar Pty Ltd dated 10 March 2015

Further to your request, the following points represent a summary of the functions relating to the post-importation value adding services that are performed by True Value Solar.

- project scoping of site and roof space and access
- setting up of roof racking system
- establishing cabling, inverter set up and switchboards
- panel placement on roof surface
- testing and commissioning of panels
- post grid connection and commissioning of system

With reference to our submissions of 23 July 2014 and 7 January 2015, the purpose of the above is to emphasise that a number of simply assembly and fitting functions are performed through the on-site fitting of solar panels, none of which represent a substantial process in the manufacture of solar panels.

The purpose of presenting these points for consideration was to highlight that Tindo simply assembles solar PV systems in Australia and actually imports the component which provides the essential character of the system (being the PV cells and inverters). This is consistent with the findings of the Indian Ministry of Commerce and guidance provided by the Anti-Dumping Commission in its Dumping and Subsidy Manual (please refer to our submissions for additional information).

From the Anti-Dumping Commission dated 5 March 2015:

I refer to the attached submission filed by PwC on behalf of True Value Solar Pty Ltd (TVS) dated 7 January 2015. On page 10 of this submission, TVS claims that "many of the functions undertaken by Tindo as part of "manufacturing" process are also performed by TVS in Australia in relation to PV modules and panels TVS sold to its customers".

I have noted that was not issue raised with the Commission before. The importer visit report (and the visit team) does not mention that TVS performs 'many of the functions performed by Tindo'. I would like seek clarification of all functions are performed by TVS to 'manufacture' PV modules or panels. Please provide details including production /assembly process including a flow chart. Also provide the address where the 'manufacturing' process is carried by TVS. This will assist the Commission to determine (and if required verify) if TVS can be regarded a 'Australian Industry' producing of PV modules or panels.

Please provide your response as soon as practical but no later than Friday 6 March 2015.