

---

**Subject:** Non-confidential email - J Reid - 6 May

**NON-CONFIDENTIAL**

**From:** Roger Simpson  
**Sent:** Wednesday, 6 May 2015 5:23 PM  
**To:** [joanne.reid@adcommission.gov.au](mailto:joanne.reid@adcommission.gov.au)  
**Cc:** 'Sharma, Sanjay'  
**Subject:** PV modules - NV calculation error

Hi Joanne,

As you are aware, it is important to Trina Solar that the correct DM calculation be included in the final report (termination or referral to Parliamentary Secretary).

Sanjay has corrected the EP calculation used for the SEF DM assessment, but I am concerned that he may not have corrected the mono module NV calculation. I have explained the error in the mono NV calculation but have had no feedback from him and hence this email.

The bottom line is that the TAC(8) adjustment to the domestic selling price of poly modules used in the SEF mono modules NV assessment, which the Commission agrees is to be the amount of the CTMS difference between mono and poly modules but with a [REDACTED]% profit mark-up, is USD [REDACTED]/w, whereas the actual verified CTMS difference between mono and poly modules over the IP with a [REDACTED]% profit mark-up is USD [REDACTED]/w. (We are contesting the [REDACTED]% profit mark-up but I am accepting it for the purpose of this email.) The mono NV used in the mono extended NV taken into account in the product DM assessment is USD [REDACTED]/w ([REDACTED] + [REDACTED]) whereas it should be USD [REDACTED]/w ([REDACTED] + [REDACTED]).

The reason for the inflation of the mono NV to USD [REDACTED]/w is Sanjay's weighting of the average adjusted domestic price of like goods, poly modules, by the export quantity of mono modules rather than by the domestic sales quantity of the like goods. He correctly assessed the NV of poly modules (USD [REDACTED]/w) using the average domestic selling price weighted by domestic sales quantities, but did not follow this correct process in the mono NV assessment which is to be the adjusted weighted average domestic selling price of the like goods, poly modules. As you are no doubt aware, export quantities have no relevance to the calculation of TAC(1) NVs, which are weighted average domestic selling prices of like goods. (s269TACB is relevant in this regard, with the DM for Trina established in accordance with ss269TACB(2)(a) – SEF sec 6.5.1 refers.)

The correct extended NV for mono modules to be taken into account in the product DM is the NV of USD [REDACTED]/w ([REDACTED] + [REDACTED]) multiplied by the mono modules export quantity.

Hereunder for information are recent email exchanges between Sanjay and I in respect of this matter. I also discussed it with him on the phone on Monday 4/5 when I asked him to let me know if the necessary NV correction is to be made, but I have had no response to date. I have not been able to get him by 'phone since Monday.

Joanne, will you please ensure that I am provided with the final DM calculations asap as I must take whatever action is necessary to ensure that the final report to be published includes the correct DM applicable to Trina's exports.

Thanks and regards,  
Roger