
Subject: Non-confidential email - J Reid - 8 May

NON-CONFIDENTIAL

From: Roger Simpson
Sent: Friday, 8 May 2015 11:06 AM
To: joanne.reid@adcommission.gov.au
Cc: 'Sharma, Sanjay'
Subject: Trina Solar- NV mono modules

Hi Joanne,

Further to my email of 6/5 hereunder concerning Trina's mono NV assessment, attached is a copy of Sanjay's most recent revised DM calculation work sheet sent to me on 1/5. The remaining errors in this DM calculation are as follows:

1. The extended EPs for the IP should be calculated by multiplying the IP unit EPs of USD [REDACTED]/w for poly (H.22) and USD [REDACTED]/w for mono (H.23) by the respective export quantities (H.5 and H.11).

USD [REDACTED]/w and USD [REDACTED]/w are the respective weighted average EPs for the IP calculated per the revised Appendix 6 to the Visit Report on the basis of submitted and verified export data and are therefore the weighted average EPs to be compared with weighted average NV's of like goods over the whole IP per ss269TACB(2)(a).

The above was pointed out to Sanjay in an email of 29 April.

2. There should be no profit mark-up to the CTMS difference between mono and poly modules in calculation of the TAC(8) adjustment to the weighted average domestic price of like goods, poly modules, in the TAC(1) mono module NV assessment.

The Commission has used a [REDACTED] % profit margin for this purpose when domestic sales of poly modules during the IP were [REDACTED] and therefore there should be no profit addition in the conversion of the cost effect of the difference between mono and poly modules to the price effect of this difference.

The Commission has used Reg 181A(2) as the ground for this profit mark-up (see SEF sec. 6.5.2(v)) when Reg 181A(2) clearly does not relate to the determination of profit for TAC(8) adjustments.

This matter is addressed in our submission of 13 April and has been the subject of discussions with Sanjay since.

3. The weighted average NV of mono modules to be compared with the weighted average EP of mono modules in accordance with ss269TACB(2)(a) is to be the weighted average domestic selling price of like goods, poly modules, with TAC(8) adjustment in the amount of the weighted average CTMS difference between mono and poly modules.

This matter is the subject of my email to you yesterday, is addressed in our submission of 13 April and has been the subject of discussions with Sanjay for some time.

Also attached is a revision of Sanjay's most recent DM calculation worksheet with highlighted corrections in accordance with the above. [Confidential]

I request your early response as to whether the Commission is to make the abovementioned corrections in calculating the DM to be included in the final report.

Thanks and regards,
Roger