



Building a better  
working world

Ernst & Young  
680 George Street  
Sydney NSW 2000 Australia  
GPO Box 2646 Sydney NSW 2001

Tel: +61 2 9248 5555  
Fax: +61 2 9248 5959  
ey.com/au

Mr Chris Vincent  
Anti-Dumping Commission  
Customs House  
5 Constitution Ave  
CANBERRA ACT 2601

22 July 2014

## NON-CONFIDENTIAL

### PT. Unelec Indonesia (“Unindo”) Power transformers exported from China, Indonesia, Korea, Taiwan, Thailand and Vietnam

Dear Mr Vincent,

We refer to your email to me dated 8 July 2014 and your email to Russell Wiese dated 11 July 2014. In your emails you requested further information regarding the financial information contained in the exporter questionnaire submitted by Unindo.

The further information requested is set out in this letter. Unindo has a strong desire to fully cooperate with the Anti-Dumping Commission (“ADC”) in relation to its investigation into the alleged dumping of power transformers (“Investigation”). To the extent that you require further information from Unindo please do not hesitate to contact us.

#### 1. Inclusion of 2011 information

In your 8 July email you noted that the income statement tab of the exporter questionnaire did not include information for 2011. We note that this information was not requested in the exporter questionnaire and you did not request it in your 8 July email. Nevertheless, we have enclosed a report setting out the audited financial reports for 2011 (we note that this was attached to the original exporter questionnaire).

Please let us know if you would like us to transpose the information from the audited financial reports to the income statement tab of the exporter questionnaire.

#### 2. Reconciliation of sales revenue

##### a. All sales and “the goods”

In your 8 July email you correctly note that in the income statement of the exporter questionnaire the sales revenue for the 2012 year for all products is different to the sales revenue for “the goods”. This is because

[REDACTED]

[REDACTED]

[Commercial-in-confidence.

Confidential production information and sales data].



**b. Reconciliation with audited financial records – 2012**

You have noted that the total sales revenue reported in the income statement for 2012 did not reconcile with the figures in the audited financial statements. The income statement reports net sales of [REDACTED] and the audited financial statement reports [REDACTED]. This is a difference of [REDACTED]. This difference is due to specific revenue reporting requirements in the audited financial statements. [Commercial-in-confidence. Confidential total sales data].

In the 2012 year there were [REDACTED]. These sales were included by Unindo in the total sales in the sales revenue tab of the exporter questionnaire. However, that revenue is not included in the Revenues line of the Statements of Comprehensive Income in the 2012 audited financial reports. Rather, the amount is set out [REDACTED]

[REDACTED]  
[REDACTED] [Commercial-in-confidence. Confidential profit and sales data].

Unindo included both the 2012 revenue of the [REDACTED] in its income statement in the exporter questionnaire. This resulted in the [REDACTED] difference between the 2012 income statement revenue and the Revenues line in the audited Statement of Comprehensive Income. [Commercial-in-confidence. Confidential production sales data and information].

**c. Reconciliation with audited financial records – Period of investigation**

In your 11 July email you note that revenue for the calendar years 2011, 2012 and 2013 is [REDACTED] according to the audited financial reports and stated to be [REDACTED] for the period 1 July 2010 to 30 June 2013 (“Investigation Period”) in the income statement included in the exporter questionnaire. The difference is [REDACTED]. [Commercial-in-confidence. Confidential revenue data].

On review it has been identified that the figures reported as sales for the period of investigation comprise of the following:

Period	Revenue (IDR million)
1 Jan – 31 Dec 2010	[REDACTED]
1 Jan – 31 Dec 2011	[REDACTED]
1 Jan – 31 Dec 2012	[REDACTED]
1 Jan – 30 June 2013	[REDACTED]
<b>Total</b>	[REDACTED]

[Commercial-in-confidence. Confidential revenue data].

As can be seen, the above figures included income for the period 1 January 2010 – 30 June 2010 that should not have been included as Investigation Period revenue.

In addition to this, the [REDACTED], as explained above, again impact to a total of [REDACTED] and [REDACTED] respectively.

[REDACTED] [Commercial-in-confidence. Confidential revenue data and information].

These impacts may be summarized in the following table in IDR millions.

Financial Reporting Data	2010	2011	2012	2013*	Total
Revenues					
<b>Total</b>					

*\*as per Income Statement as incomplete financial year and so cannot be reconciled to 2013 financial statements.*

[Commercial-in-confidence. Confidential revenue and sales data].

It is considered that these sufficiently explain the difference between the figures reported for the 2011, 2012 and 2013 years and the figures reported for the "investigation period".

### 3. Reconciliation between income statement and sales summary or turnover spreadsheet

In your 8 July email you note that the 2012 and 2013 total company turnover does not reconcile to the figures in the income statement. Please note that the income statement tab covers the 2012 and 2013 calendar years whereas the turnover tab covers the years ending 31 March 2012 and 31 March 2013. Effectively this means there is only 3 months of similarity between the "2012" or "2013" period on the income statement tab and the "2012" and "2013" on the turnover tab. This essentially means that the figures are not comparable.

Please let us know whether you require any further information in respect of this issue.

### 4. Australian sales reconciliation

In your 8 July and 11 July emails you note that there is a difference between Australian sales in the sales summary of the turnover tab of the exporter questionnaire and the export sales summary in the Australian sales tab. The reason for this is that the Australian sales tab only details those goods exported to Australia during the Investigation Period, whereas the turnover tab details when the income was recognized by Alstom from an accounting perspective.

The differential is one transaction, [REDACTED] Alstom's accounting treats this transaction as revenue within the Investigation Period so it appears as Australian sales in the sales summary of the turnover tab but the goods were exported after the Investigation Period and so were not reported in the export sales summary of the Australian sales tab. [Commercial-in-confidence. Confidential sales information].

We trust this is sufficient explanation. Nevertheless, please let us know whether you require any further information in respect of this issue or prefer that we adjust the exporter questionnaire.

### 5. Total turnover reconciliation

In your 8 July email you noted that total turnover in the domestic sales summary tab does not reconcile to the turnover of the goods in the sales summary tab. [REDACTED]



Building a better  
working world

Mr Chris Vincent  
The Anti-Dumping Commission  
Page 4

[Commercial-in-confidence. Confidential domestic sales data and information].

We have attached a spreadsheet summarizing all domestic sales of the GUC delivered during the Investigation Period, with the newly added transactions highlighted for ease of reference. You will note that the total sales volume [redacted]. This is now the same as the total set out in the sales summary for domestic sales during the Investigation Period. [Commercial-in-confidence. Confidential sales data].

We trust that the above information satisfies the requests set out in your 8 and 11 July emails. However, please feel free to contact on (02) 9248 5553 if you require further information or clarification.

Yours sincerely

Marc Bunch  
Partner – Global Trade