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1 August 2019

Mr Reuben McGovern
Anti-Dumping Commission
Level 35, 55 Collins Street
Melbourne VIC 3000

Dear Reuben,

Investigation 507 – Power Transformers exported from the People's Republic of China
WTC Response to GE Submission dated 22 July 2019 - Document 507-040

Wilson Transformer Company (WTC) has reviewed Hunt & Hunt's submission dated 22 July 2019 for GE Grid Australia Pty Ltd (GE AU) and GE High Voltage Equipment (Wuhan) Co Ltd (GE Wuhan) in relation to the Anti-Dumping Commission (ADC) investigation 507 and wishes to make the following observations –

1. **Page 1 Para 3** WTC again strongly rejects the assertion by GE AU that WTC has not suffered any loss due to the export of power transformers from GE Wuhan based on GE AU's view WTC had not been considered as a genuine competitor for contracts won by GE AU.

2. In submission dated 18 June 2019, WTC –
   - Provided examples of transformers it has supplied over a long period of time including a 550MVA 330/132kV auto transformer in 2015
   - Provided brief details of the Glen Waverley plant upgrade in the 2009-2012 period, which substantially increased throughput capacity, product range and testing capability.

3. **Page 1 Point (a)** The relevant transmission voltages in Australia are 66kV, 110kV, 132kV, 220kV, 275kV, 330kV and 500kV. WTC has no intention, in the near future, of supplying 500kV power transformers. The Dumping Investigation is for power transformers equal to or greater than 10MVA and voltage rating of less than 500kV. For Australia this includes power transformers with voltages up to and including 330kV.

4. **Page 2 Point (b) and (c)** The 550MVA 330/132kV Auto transformer had an equivalent double wound capacity of approximately 500x(330-132)/330 = 330MVA, which was within the testing capability of WTC including temperature rise and impulse.

5. **Page 2 Point (d)** If GE has provided information to the ADC on the performance of a WTC transformer, WTC requests access to this information in order to verify whether the information is correct or not, otherwise the information is inadmissible. Likewise, WTC could provide information on Alstom GE transformers, but this has not been our intent to date.

6. **Page 2 Point (e) and (f)** WTC has cut a number of different core arrangements on it's 1000mm Georg line. As far as WTC is concerned, a 5-limb core is just another arrangement. For three phase power transformers, WTC has a preference for 3-limb cores as they only have 5 laminations in a lamination layer. A 5-limb core by comparison has 13 laminations in a lamination layer involving more pallets and time to build the core. WTC has considered the option of cutting 5-limb cores in house or buying complete leg and yoke lamination stacks in containers from a recognised supplier. GE have misinterpreted WTC letter of 22 July 2019. Drawings are available for WTC 5-limb cores which can be built on WTC's Georg core building table with some very minor modifications. The major benefit of a 5-limb core is lower height which reduces overall transformer height, transport difficulties and transport costs. WTC has offered 5-limb cores in the past and intends to build a 5-limb core in the near term on a production unit. As such 5-limb cores are not a restriction on WTC's capability to supply.

7. **Page 2 Point (g)** WTC has provided extracts from the customer's specification to the ADC which precluded WTC from submitting a bid. The very onerous restrictions were based on the capability of the supply factory and were –
    - Number units 330kV and above in last 12 months >10
    - Number of Generator Transformers (GTs) above 200MVA in last 5 years >10
    - Number of short circuit tests on GTs above 100MVA to IEC 60076-5 >2

    The specification, including the above restrictions, followed consultation with suppliers including WTC.

8. **Page 3 Point (h)** No comment.

Should the ADC require clarification on the forgoing observations, we would be pleased to assist.

Yours sincerely,

Robert Wilson
Executive Chairman