DuPont Photovoltaics & Advanced Materials
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September 28, 2017

The Honorable Rhonda K. Schmidtlein
Chairman
U.S. International Trade Commission
500 E Street, SW
Washington, DC 20436

Dear Chairman Schmidtlein,

I am Global Business Director for DuPont Photovoltaic & Advanced Materials, a business unit of E.I. du Pont de Nemours and Company with its corporate headquarters in Wilmington, Delaware. DuPont is a leading, global supplier of specialty materials to the solar energy industry. Since 1975, it is estimated that more than half of the world's installed solar panels contain DuPont materials.

We manufacture products in the U.S. that are sold globally and used by customers in the production of solar cells and panels, which are also sold globally. In addition, key raw materials are produced or processed in the U.S. and are necessary in the further production of some of our DuPont products in the U.S. and other locations. Manufacturing sites in the U.S. are located in Kentucky, New York, North Carolina, Ohio and Puerto Rico. Our solar products business is also supported by research and development facilities in Delaware. DuPont's flagship products, DuPont™ Solamet® photovoltaic metallization pastes and DuPont™ Tedlar® polyvinyl fluoride films, have a history of being recognized as benchmarks in the industry. DuPont, which earlier this month completed its merger with Dow, employs approximately 46,000 employees globally. Of those 46,000 employees, approximately 500 U.S. employees are located at DuPont facilities that support our global solar products business. Additionally, beyond being a supplier, DuPont is also a PV system owner and PV electricity user, with PV systems in use at 16 current and former DuPont sites around the world.

DuPont materials have been used in solar panels for over 40 years. In 2016, DuPont continued its tradition of innovation and launched new products in both the Solamet® metallization paste product line, which helps enable customers to increase power output and efficiency of their solar cells and modules, and in the Tedlar® backsheet film product line to reduce cost while providing protection for solar panels from harsh environments. These launches drove continued volume growth worldwide of products supported by the DuPont U.S. workforce.

I strongly oppose any import relief that would raise the cost of crystalline silicon photovoltaic cells (CSPV) and modules. I believe that the relief sought by Suniva would have a detrimental impact on the broader U.S. solar industry, including DuPont's solar materials business, resulting in a dramatic decline in the purchase and installation of solar panels in the country and endanger tens of thousands of skilled/high paying U.S. jobs.

The remedies sought by Suniva would essentially double the price of imported solar panels, putting solar energy out of reach of mainstream America and dramatically reduce the deployment and installation of PV systems in the U.S..

With the imposition of Suniva's proposed remedy, I expect fewer PV systems would be installed in the U.S., which would significantly reduce demand for specialty solar materials, including those offered by DuPont, and jeopardize DuPont U.S. jobs. Additionally, our ability to fund research and development efforts that drive innovation of new technology to help increase both the power output and solar system efficiency, would be impacted.

The success of the solar industry and our solar materials business depends on CSPV modules and systems being able to compete against other forms of energy. A key factor is the reliability and long life of solar modules. As an example, solar panel backsheets made with DuPont Tedlar® products are of high quality and reliability and there are examples of solar panels made with such back sheets that are still operating in the field over 30 years after being deployed. These materials are designed for protection and to help enable the module to continue to deliver anticipated power output over many years of use in a variety of environments. If the cost of imported solar modules dramatically increases to compensate for the relief sought by Suniva, the manufacturers of these modules will look for any way to further reduce costs, including the materials that are used in the production of the solar panels. We are concerned that such efforts to reduce costs as much as possible would drive the use of lesser performing materials, which would decrease the life of the module and even result in failing systems. If CSPV energy systems start to fail prematurely, the industry as a whole will suffer.

I respectfully ask ITC to consider these points and recommend remedies that are reasonable, but not damaging to the continued growth of the solar industry in the U.S.

Sincerely yours,

Chuck Xu
Global Business Director
DuPont Photovoltaic & Advanced Materials