

October 5, 2017

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW
Washington, D.C. 20436

Re: Investigation TA-201-75

Dear Secretary Barton:

The California Fresh Fruit Association writes to express our concern with the pending Section 201 global safeguard case regarding solar cell and module manufacturing in the United States. The California Fresh Fruit Association is a voluntary public policy organization that works on behalf of our members – growers, shippers, marketers and associates – on issues that specifically affect member commodities: fresh grapes, kiwis, pomegranates, cherries, blueberries, peaches, pears, apricots, nectarines, plums, interspecific varieties and apples and persimmons. It is the Association's responsibility to serve as a liaison between regulatory and legislative authorities by acting as the unified voice of our members. We are concerned that the petition's proposed trade remedy would be harmful by raising energy costs while eliminating economically viable means to comply with California's strict carbon dioxide limits, water restrictions and renewable energy mandates.

The proposed tariffs and minimum prices would double the cost of imported solar cells and modules used in farming operations. This dramatic cost-increase would jeopardize the financial viability of planned and future solar investments in the agriculture industry. Over the last decade, high cost historically limited adoption of on-farm PV solar systems that are connected to the grid. However, in recent years PV solar cost reductions have been stimulated by technology advancements and the scale of market development. Agriculture is most prevalent in rural areas that have high energy cost or limited grid access. Tariffs would create a massive setback in this progress, and potentially take away the opportunity for farmers to invest in solar.

The agriculture community depends on the availability of secure, diverse, and affordable energy resources to power our facilities, machinery, and homes. Farmers utilize electricity generated from renewable and alternative sources, including large-scale solar photovoltaic systems, to directly power processing facilities, watering systems, lighting systems, buildings and other critical farm equipment.

For these reasons, we respectfully urge the Commission to carefully consider the negative and potential impacts that high tariffs and minimum prices on solar cells and modules would have on farmers and the agriculture sector.

Sincerely,



George Radanovich
President