

**Written Statement**  
**Petition for Global Safeguard Relief Pursuant to Sections 201-202 of the Trade Act of 1974**  
**- Crystalline Silicon Photovoltaic Cells and Modules**  
**International Trade Commission**

Good Morning, my name is Brian Quinlan and I represent Calvert Energy LLC, a veteran owned small business involved in the solar energy industry. We are providing this statement to the U.S. International Trade Commission (ITC) to voice our strong opposition to the Suniva Section 201 petition being brought forward to the ITC. The Section 201 trade law is an important component of U.S. trade law, but these petitioners do not merit the trade protections provided under this provision. The petitioner's proposed tariffs and price floors would cause severe harm to the solar industry by causing job losses across the United States.

Suniva, a company that has declared bankruptcy, and SolarWorld are makers of solar cells and modules that are struggling to stay afloat. These two companies are seeking government protection through filing a Section 201 petition. Manufacturing is a very difficult business. Foreign manufacturers of solar panels have also been struggling with an over-supply which forced prices down. Many of these foreign manufacturers have also gone bankrupt, been purchased or suffered significant losses. That is part of doing business and market fluctuations must be managed effectively to compete. If Suniva and SolarWorld can claim Section 201 protections to keep their struggling companies afloat, then the bar for future trade cases would be dangerously low for any American manufactures in similar circumstances.

The proposed remedies will significantly harm American manufactures of solar parts and panels and the entire solar industry in the United States more broadly. According to Wall Street analysts, the proposed remedies would double the price of solar panels in the U.S. The cost of starting a project in the U.S. would rise dramatically, slashing demand for solar projects harming solar energy's position in the electricity market. The reduced demand will have the opposite effect of its intention. A reduction in demand will force manufacturers to lower prices which will in turn impact their ability to make a profit thus making matters worse for U.S. manufacturers.

The U.S. solar industry employs roughly 260,000 workers, more than 38,000 of whom manufacture a wide range of solar components, such as racking systems and inverters. In contrast, Suniva employed only 260 workers when it declared bankruptcy. This trade petition threatens to cut off the cells and modules that form the basic ingredients for the entire solar supply chain ecosystem, placing those 260,000 U.S. jobs at risk. It does not make sense to put 260,000 jobs at risk to save 260 jobs.

Solar energy is one of the most promising sectors in the American economy, providing good jobs and valuable products at low cost to consumers. The industry is valued at \$23 billion and was the top source of new U.S. electricity generation in 2016. Last year, the solar industry created 51,000 jobs, approximately one in every 50 new jobs created in the United States. Imposing tariffs on such a rapidly growing industry that can compete both domestically and globally would be constrain America's technological and economic prowess.

We hope the ITC will take these facts into account and end this Section 201 investigation. Should you have any questions, please do not hesitate to contact me at (301) 208-0153 or [brian@calvertenergy.com](mailto:brian@calvertenergy.com).

Thank you,

A handwritten signature in black ink, appearing to read 'B. Quinlan', with a stylized flourish at the end.

Brian Quinlan  
President/CEO  
Calvert Energy LLC

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