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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

My name is Richard Harkrader and I am the CEO of Carolina Solar Energy, a company involved in the development of utility scale solar energy projects in North Carolina and Virginia. 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.

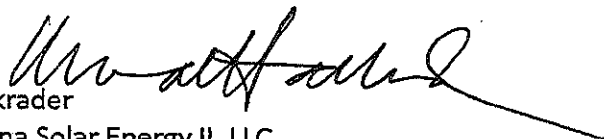
The petitioner's business failures are of their own making. The first trade case SolarWorld instigated cost my business severely. Why would they think their company who caused US solar businesses such harm would buy their products? In addition their products were not meeting the demands of our projects – the panels are too small and the wrong technology for the projects we do.

The proposed remedies will significantly harm American manufacturers of solar parts and panels and companies like mine that develop solar projects. The petition seeks a tariff of 40 cents per watt on all foreign-made solar cells, with a floor price of 78 cents per watt on all panels made with foreign inputs. The cost of solar projects and solar generated electricity in the U.S. would rise dramatically, slashing demand for solar projects and harming solar energy's position in the electricity market.

This trade case if decided for the complainants will severely disrupt and curtail our business, and has already had a very negative effect on our projects that we have spent over a year and many \$100,000 developing and are scheduled for construction in 2017, 2018 and 2019. Carolina Solar Energy strongly requests a quick decision in this case so we can move forward with or cancel these projects.

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 rharkrader@carolinasolarenergy.com or 919682-6822.

Thank you,


Richard Harkrader
CEO of Carolina Solar Energy II, LLC