

# The Seminole Companies

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United States International Trade Commission  
500 E Street, SW  
Washington, DC 20436

## **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 Chris Diaz and I represent Seminole Financial Services, LLC, we provide financing for solar energy transactions. 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, particularly among small and medium sized manufacturers.

Suniva, is a company that has declared bankruptcy, and SolarWorld is a company that makes solar cells and modules which is struggling to stay afloat. These two companies are seeking government protection through filing a Section 201 petition. 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 manufacturers in similar circumstances.

The proposed remedies will significantly harm American manufacturers of solar parts and panels. 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. 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 and harming solar energy's position in the electricity market.

Both the size and scope of these tariffs will affect U.S. solar 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.

Solar energy is one of the most promising sectors in the American economy, providing good jobs and valuable products at a 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—one that can compete both domestically and globally —would 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 my office at (727) 331-8453.

Thank you,

A handwritten signature in black ink, appearing to read "CD", is positioned above the typed name.

Chris Diaz  
Principal and Executive Vice President

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