



September 20, 2017

PUBLIC DOCUMENT
Inv. No. TA-201-075

VIA ELECTRONIC FILING (EDIS)

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:

We are submitting the following letter on behalf of the military personnel, veterans, and advisors in the attached letter. Should the Commission have any questions regarding this submission, please contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Paul Nathanson", with a long horizontal flourish extending to the right.

Paul Nathanson

202-828-1714

ATTN: Lisa Barton, Secretary
The Honorable Chairman Rhonda K. Schmidlein
U.S. International Trade Commission
500 E Street, SW
Washington, D.C. 20436

September 20, 2017

Re: Investigation TA-201-75

Dear Chairman Schmidlein:

We the undersigned retired and former U.S. military professionals are writing to express our deep concern with the pending Section 201 global safeguard case regarding solar cell and module manufacturing in the United States. As veterans and former defense energy professionals, we are deeply concerned the petition's proposed trade remedy would be harmful to the national and energy security efforts of the U.S. Department of Defense (DoD).

The proposed tariffs and minimum prices would double the cost of imported solar cells and modules used in utility-scale defense energy projects. This dramatic cost-increase could potentially jeopardize the financial viability of planned and future solar investments on or near domestic military bases.

As the single largest consumer of energy in the U.S., the military depends on the availability of secure, diverse, and affordable energy resources to power military installations and mission-critical facilities. The DoD utilizes electricity generated from renewable and alternative sources, including large-scale solar photovoltaic systems, to directly power military bases, their systems, buildings and facilities.

Solar energy systems on or near military bases are used to mitigate utility, grid and other energy disruptions which may impact an installation's mission assurance and war fighting operations. Military bases also serve as emergency response centers for surrounding communities, reinforcing DoD's need for uninterrupted power. In fiscal year 2016, the DoD reported 701 utility outages on military installations resulting from external and internal commercial utility interruption of its electric, gas, and water utilities that lasted eight hours or longer, a majority of which were a result of electric disruptions.

To help meet these challenges, each military branch is deploying renewable and alternative energy projects and federal law calls on the DoD to produce or procure 25 percent of its facility energy from renewable sources by 2025. To support the DoD's energy security imperatives, domestic bases have secured cost-effective solar photovoltaic energy which has benefited greatly from the steep decline in solar panel costs over the last decade. This has enhanced military readiness while producing substantial cost-savings to the federal government.

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 the DoD's energy security and resilience efforts.

Sincerely,

L.R. Hering, RADM (ret)
US Navy

Norm Seip, Lt. Gen. (ret)
US Air Force

Michael Wu
US Air Force, Special Advisor for Energy
(former)

Kate Brandt
US Navy, Special Advisor for Energy
(former)

Jon Powers
US Army, Special Advisor for Energy
(former)

Jason Cain
US Army Veteran

Donald E. Martinez
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Jesse Medlong
US Navy Veteran

Andrea Marr
US Navy Veteran

Benjamin Parry
US Army Veteran

Paul Clarke
US Air Force Veteran

Derek Oliver
US Marine Corps Veteran

David Anderson
US Marine Corps Veteran

Brendan McKinnon
US Coast Guard Veteran