



The Honorable Gina M. Raimondo  
Secretary of Commerce  
U.S. Department of Commerce  
14th Street & Constitution Avenue, NW  
Washington, D.C. 20230

Dear Secretary Raimondo:

We are Renewable Energy Vermont, a U.S. association representing the renewable energy community in Vermont. Our members include businesses, non-profits, and utilities working to promote, install, and integrate clean, renewable energy into the grid. As part of this work, we support investment in clean energy, including solar energy, through public education and engagement, shaping energy laws and regulations, promoting training and job/internship opportunities, and leading a comprehensive network of renewable energy innovators, businesses, and climate action thought leaders

We are deeply concerned about a request for country-wide circumvention inquiries brought by Auxin Solar – a single, small U.S. manufacturer – covering crystalline silicon photovoltaic (“CSPV”) products imported from Malaysia, Thailand, Vietnam, and Cambodia. Auxin Solar is attempting to single-handedly expand the reach of antidumping and countervailing duties on solar products from China to the majority of solar imports into the United States.

This request would have far-reaching effects on the U.S. solar industry, including U.S. manufacturers that rely upon cells from the targeted countries for CSPV cells used module production. Anti-circumvention inquiries could hurt the work of our members that provide critical clean energy services to American homes and businesses. President Biden has positioned himself as a pro-clean energy president that wants the United States to be a leader in clean energy technologies.<sup>1</sup> We, along with our members, are already working toward this goal with our efforts to shape energy laws and regulations to support solar deployment and the active development of solar power at residential, commercial, and utility scales. Imports of CSPV cells and modules are critical to maintain a stable supply of materials and to ensure that the U.S. solar industry continues to thrive – and that the Biden Administration meets its clean energy goals. By targeting the vast majority of CSPV cell and module imports into the United States, the requested anti-circumvention inquiries could threaten existing and future solar projects that rely on imports, in addition to the well-paid solar jobs that these projects create.

We therefore strongly urge you to dismiss Auxin Solar’s request and decline to initiate this harmful action against American clean energy supply chains.

Sincerely

A handwritten signature in cursive script that reads "Jonathan Dowds".

Jonathan Dowds  
Deputy Director