



June 22<sup>nd</sup>, 2014

Ms Candy Caballero  
Director Operations  
Australian Anti-Dumping Commission  
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**PV Modules from China – ANTI- DUMPING NOTICE NO. 2014/38  
Non-Confidential**

Dear Candy,

The Australian Solar Group (ASG) is an Australian developer of utility-scale solar projects and associated ground mounting system technology for PV panels. We have been investing in the development, proof and patenting of our mounting system for more than 4 years and the development of projects for more than 3.

Our mounting system is designed to reduce the cost and time associated with ground mounting solar PV panels. As such, it is designed to use utility scale panels – the largest available, which are currently 300W+. Using panels of a smaller size (such as 270W) would significantly increase the cost of projects, to the point where they would not be viable.

Using our nearest term project as an example (49MW anticipated to commence construction in October 2014) the change to our project would be as follows:

- Increased size of the mounting system to accommodate an additional 20,826 panels;
- Increase the cost of cabling (both the length and diameter of cables would need to be increased);
- Increase the land area required by approximately 14%;
- Increase the labour for constructing the mounting system, attaching >20,000 panels and the electrical connection of these panels; and
- Increasing the length and cost of the fencing of the project by ~14%.

ASG went to tender for solar panels. Our selection criteria were:

1. Panel size of 300W or greater;
2. Bankable (in Australia) product warranty of at least 20 years;
3. Delivery capacity (to us) of at least 100MW/a for 2015/2016 (we have other projects under development);
4. Australian approvals; and
5. Demonstrated track record at utility-scale.

The need to meet the demands of the finance industry for both project equity and project debt is addressed by selection criteria 2,4 and 5. Without meeting these criteria, projects (ASG or others) will not be able to finance utility-scale projects. Criteria 1 relates to project capital cost. ASG would be unable to secure viable Engineering Procurement and Construction services (also essential to project funding and securing Australian Government support) without meeting criteria 2,3,4 and 5.

While ASG supports the desire to protect Australian industry, Australian industry must be competitive with a global market in terms of product cost, specification, performance and “bankability”. The reality is that the Australian PV industry cannot produce product for the utility-scale solar industry:

- In sufficient volume;
- Of a specification that meets the industry’s needs; or
- That can be incorporated in projects needing Project Finance

To be clear, Tindo Manufacturing Pty Ltd, the only company that assembles solar PV panels, is not able to manufacture product that meets the requirements of the utility-scale solar market.

Utility solar PV panels (panels of 300W or more) should be excluded from the goods under consideration in this investigation. We request that this action be taken as a matter of urgency so as not to cause projects under development to be halted due to cost uncertainty pending the outcome of the investigation.

Please do not hesitate to contact me should you require further details, or if we can assist in any way.

Sincerely,



Dave Holland  
**Director**