



Clean Energy Buyers Association
1425 K St NW Ste 1100
Washington, DC 20005

May 2, 2022

The Honorable Gina M. Raimondo
Secretary of Commerce
14th Street & Constitution Avenue, NW
Washington, DC 20230

RE: Crystalline Silicon Photovoltaic Cells, Whether Or Not Assembled Into Modules From The People's Republic of China: Auxin Solar's Request For An Anti-Circumvention Ruling Pursuant To Section 781(b) Of The Tariff Act Of 1930, As Amended

Dear Secretary Raimondo:

Thank you for accepting public comments on this important matter. The Clean Energy Buyers Association (CEBA), representing more than 310 member companies, implores the Department of Commerce to reach a Preliminary Determination in this matter as quickly as possible. Delay injects untenable uncertainty into solar deployment that puts both the government's and our member companies' clean energy commitments at risk.

Two-thirds of Fortune 100 companies and roughly half of Fortune 500 companies have set ambitious climate and clean energy targets. CEBA's 310 member companies are leaders in the corporate movement for clean energy investment, development, and deployment and represent over \$7 trillion in annual revenues and over 16 million domestic employees. CEBA members have been involved in over 90 percent of all large-scale U.S. corporate renewable energy deals to date.

Corporate and large institutional energy customers drive a significant portion of the clean energy market in the United States. Since 2014, corporate and other large institutional energy customers have procured 52 gigawatts (GWs) of new, large-scale wind and solar capacity, which is equivalent to over one third of wind and solar capacity installed in the United States in that time. Last year alone, energy customers voluntarily contracted for a record 11 GW of new wind and solar. Of this 11 GW, 80% were solar energy transactions, and since 2019, that percentage has been over 70%.

The petition and its potential for retroactive tariffs has introduced uncertainty to the market already – leading to job losses, decreased investment, and delays or cancellations of solar transactions. Energy customers report nearly all solar deals are at a standstill and are directly feeling the impact of what the Solar Energy Industries Association reports is [51 GWs from 318 projects](#) canceled or delayed.

Every day the issue is not resolved, CEBA members are at severe risk of failing to meet publicly accountable commitments to climate and emissions reductions, which will negatively impact the entire clean energy market, as well as overall efforts to reduce greenhouse gas emissions.

Thank you for working expeditiously to resolve these inquiries.

Sincerely,

A handwritten signature in blue ink, appearing to read "M Ballentine", is written over a light blue horizontal line.

Miranda Ballentine
CEO

cc: A-570-979 and C-570-980 case teams