

Non-Party Witness Statement - SunTegra

Date: October 3, 2017

Investigation No. : TA-201-75

Witness: Oliver Koehler, CEO
SunTegra, 181 Westchester Ave. Suite 409, Port Chester, NY 10538

Re: *Crystalline Silicon Photovoltaic Cells (Whether or Not Partially or Fully Assembled into Other Products), Inv. No. TA-201-75; Non-Party Witness Testimony in Opposition to Remedies by SunTegra*

Good afternoon. My name is **Oliver Koehler**. I am the CEO and founder of SunTegra, a solar start-up based in Port Chester, NY. SunTegra develops, manufactures and sells innovative solar panels that integrate into niche building and infrastructure applications. Our solar panels are small and similar in size to off-grid and portable solar panels.

Let me first make clear that we are opposition to the proposed trade remedies. We have already complied with existing AD and CVD remedies at considerable expense.

However, if remedies are recommended I ask that **all low wattage solar panels with power ratings of 120 watts or less** be excluded for the following reasons:

- 1) Small, low wattage solar panels are **not manufactured by petitioners** and **do not compete directly with their high volume solar panels** which typically have power ratings of 250 to 400 watts or more.
- 2) The **overall market size and imported quantities are insignificant**. The market size for these products is well under 1% of the entire market.
- 3) Excluding small, low wattage solar panels will be **easy for Customs to enforce**. The watt rating of a solar panel is always clearly labeled on the back of each and every solar panel and discerning a product's watt rating is easier than discerning a products end use.
- 4) **There is a precedent** for the exclusion of small, low wattage solar panels. In 2014, Canada followed the United States in imposing AD, CVD duties against solar imports, but excluded solar panels that had power ratings of 100W or less.

In summary please exclude small, low wattage panels of 120 watts and below. This will shield a niche market from disruption without causing any injury to the petitioners.

Thank you.