

June 17, 2019

The Honorable Robert Lighthizer
United States Trade Representative
600 17th Street NW
Washington, DC 20508

Via Electronic Submission – www.regulations.gov

RE: [Docket Number USTR 2019-0004-0001] Notice of Action and Request for Public Comment Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation

Dear Ambassador Lighthizer:

We, the undersigned, write today on behalf of a broad range of U.S. energy interests to oppose the proposed modification of action of another tariff of up to 25 percent on the 4th tranche of imports from China valued at \$300 billion. The existing tariffs are already negatively affecting American companies and the proposed tariffs will further exacerbate these negative impacts. Those impacted include American companies with energy interests, including technology and service providers in the energy efficiency, energy storage, demand response, information technology, manufacturing, natural gas, renewable energy and sustainable transportation sectors.

The existing Section 301 tariffs on imports from China are having a harmful impact on domestic clean energy industries – affecting a range of raw materials, components and products. These industries support over three million jobs in the U.S. today and are poised for significant growth in the years ahead, provided they have stable market conditions.

Many domestic clean energy industries face intense competition from abroad and the prospect of paying up to 25 percent more for components puts U.S. industries at a competitive disadvantage. Further, some U.S. clean energy technology sectors are relatively new, with developing supply chains, and utilize components that cannot be procured from anywhere but China at this time.

While we strongly oppose the pending action, should it move forward, we request that USTR establish an exclusion process for this proposed 4th tranche of tariffs. Establishing an exclusion process for these affected clean energy industries to share important market impacts and request remedies is paramount to U.S. competitiveness, job creation and the continued growth of domestic energy industries.

Thank you for your leadership in addressing China's unfair trade practices. We stand ready to work with the administration to ensure that the U.S. remains the leader in advanced energy technologies and that the technologies of the future are manufactured in America.

Sincerely,

Business Organizations

Advanced Energy Economy (AEE)
Alliance to Save Energy
American Gas Association (AGA)
American Wind Energy Association (AWEA)
Business Council for Sustainable Energy (BCSE)
Clean Energy Business Network (CEBN)
Global Energy Institute, an affiliate of the U.S. Chamber of Commerce
Fuel Cell and Hydrogen Energy Association
Philadelphia Solar Energy Association
U.S. Energy Storage Association (ESA)

Companies

Amicus Solar Cooperative
Capital Sun Group, Ltd. (CSG)

Companies, continued

CleanTech Docs, Inc.
Danfoss
Echogen Power Systems (Delaware), Inc.
Estriatus Law, PC
Fireplace Editions
GHG Engineering, LLC
Google Nest
HCS Group, Inc.
Inovateus Solar
Marketing for Green, LLC
Modern Communication Technology
Oasis Montana Inc.
Onboard Dynamics, Inc.
PDC Machines, Inc.
PDR Associates & Energy Group Inc.
Plug Power Inc.
Proterra Inc.
Schneider Electric
Signify
Smardt Chillers, Inc.
Sonex Research, Inc.
TerraShares, a clean energy developer for non-profits
The Stella Group, Ltd.