U.S. PRODUCERS' QUESTIONNAIRE

LARGE POWER TRANSFORMERS FROM KOREA

This questionnaire must be received by the Commission by May 21, 2018

See last page for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its review of the antidumping duty order concerning large power transformers from Korea (Inv. No. 731-TA-1189 (Review)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

1									
Address									
City			State	e	Zip Cod	e			
Website									
Has your firm pi 2012?	roduced lar	ge power tran	sformers (as de	fined on th	ne next pag	e) at any tim	e since Janı	uary 1,	
□NO	(Sign the cer	tification below	and promptly ret	turn only thi	s page of th	e questionnair	e to the Com	mission)	
YES	(Complete al	l parts of the qu	estionnaire, and	return the e	ntire questi	onnaire to the	Commission)	
Return question https://dropbo			-	<i>x</i> by clicki	ng on the	following li	nk:		
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PART I.—GENERAL INFORMATION

<u>Background</u>.--On August 31, 2012, the Department of Commerce ("Commerce") issued an antidumping duty order on imports of large power transformers from Korea. On July 3, 2017, the Commission instituted a review pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. § 1675(c)) (the Act) to determine whether revocation of the order would be likely to lead to continuation or recurrence of material injury to the domestic industry within a reasonably foreseeable time. If both the Commission and Commerce make an affirmative determination, the order will remain in place. If either the Commission or Commerce makes a negative determination, Commerce will revoke the order. Questionnaires and other information pertinent to this proceeding are available at https://www.usitc.gov/investigations/701731/2017/large_power_transformers_korea/first_review_full.htm.

<u>Large power transformers</u> covers large liquid dielectric power transformers ("LPTs") having a top power handling capacity greater than or equal to 60,000 kilovolt amperes (60 megavolt amperes), whether assembled or unassembled, complete or incomplete.

Incomplete LPTs are subassemblies consisting of the active part and any other parts attached to, imported with, or invoiced with the active parts of LPTs. The "active part" of the transformer consists of one or more of the following when attached to or otherwise assembled with one another: The steel core or shell, the windings, electrical insulation between the windings, or the mechanical frame for an LPT.

The product definition encompasses all such LPTs regardless of name designation, including but not limited to step-up transformers, step-down transformers, autotransformers, interconnection transformers, voltage regulator transformers, rectifier transformers, and power rectifier transformers.

The LPTs subject to this order are currently classifiable under subheadings 8504.23.0040, 8504.23.0080, and 8504.90.9540 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this order is dispositive.

Reporting of information.— If information is not readily available from your records in exactly the form requested, furnish carefully prepared estimates. If your firm is completing more than one questionnaire in connection with this proceeding (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions in the questionnaires.

<u>Confidentiality</u>.--The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. § 1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

<u>Verification</u>.--The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all of your files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

Release of information.--The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in

connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

I-1. <u>OMB statistics</u>.--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire.

Hours	Dollars

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this questionnaire. Please attach such comments to your response or send to the Office of Investigations, USITC, 500 E St. SW, Washington, DC 20436.

I-2. <u>Establishments covered</u>.--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. If your firm is publicly traded, please specify the stock exchange and trading symbol in the footnote to the table. Firms operating more than one establishment should combine the data for all establishments into a single report.

"<u>Establishment</u>"--Each facility of a firm involved in the <u>production</u> of large power transformers, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments Covered ¹	City, State	Zip (5 digit)	Description
1			
2			
3			
4			
5			
6			

¹ Additional discussion on establishments consolidated in this questionnaire:

Country	Support	Oppose	Take	e no positio
Korea				
	rm owned, in whole or in		firm?	
Firm name	Address			Extent of ownership (percent)
foreign, that are engagere engaged in export	portersDoes your firm ged in importing large pointing large power transformsList the following info	ower transformers in mers to the United	nto the Un States?	ited States o
foreign, that are engagare engaged in export	ged in importing large point ing large power transfor	ower transformers in mers to the United	nto the Un	ited States o

Country	Affiliation

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from Nathanael Comly (202-205-3174, nathanael.comly@usitc.gov) or Christopher Robinson (202-205-2542; christopher.robinsonw@usitc.gov). Supply all data requested on a calendar-year basis.

II-1.	Contact infor	mationPlease identify	the responsible	individual and the manner by which
	Commission s	taff may contact that in	dividual regardiı	ng the confidential information submitted
	in part II.			
				-
	Name			
	Title			
	Email			
	Telephone			

II-2a. <u>Changes in operations.</u>—Please indicate whether your firm has experienced any of the following changes in relation to the production of large power transformers since January 1, 2012.

Checi	k as many as appropriate.	If checked, please describe; leave blank if not applicable.
	Plant openings	
	Plant closings	
	Relocations	
	Expansions	
	Acquisitions	
	Consolidations	
	Prolonged shutdowns or production curtailments	
	Revised labor agreements	
	Corporate restructuring	
	Other (e.g., technology)	

II-2b.	Anticipated changes in operationsDoes your firm anticipate any changes in in the character of
	its operations or organization relating to the production of large power transformers in the
	future?

No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue. Include in your response a specific projection of your firm's capacity to produce large power transformers (in MVA top rated) for 2018 and 2019.

II-3a. **Production using same machinery.--**Please report your firm's production of products made on the same equipment and machinery used to produce large power transformers, and the combined production capacity on this shared equipment and machinery in the periods indicated.

"Overall production capacity" or "capacity" – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup).

"**Production**" – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

Quantity (in MVA top rated)						
	С	alendar year	January-March			
Item	2015	2016	2017	2017	2018	
Overall production capacity						
Production of: Large power transformers (60 to 299 MVA)						
Large power transformers (over 300 MVA)						
Total large power transformers ¹	0	0	0	0	C	
Other products ²						
Total	0	0	0	0	(

II-3a. **Production using same machinery —Continued**

<u>RECONCILIATION OF LARGE POWER TRANSFORMERS PRODUCTION</u>.--Please ensure that the quantities reported above for large power transformers (i.e., those of 60 to 299 MVA plus those over 300 MVA) in each time period equal the quantity reported for large power transformers in II-4 (i.e., line C) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar year			January-March		
Item	2015	2016	2017	2017	2018	
Total large power transformers – question II-4 line C = zero ("0"), if						
not revise.	0	0	0	0	0	

II-3b.	Operating p		-The production capacity reported in II-3a is based on operating per year.	hours
II-3c.			lease describe the methodology used to calculate overall production a, and explain any changes in reported capacity.	
II-3d.	Production of		Please describe the constraint(s) that set the limit(s) on your firm's	
II-3e.		s that have r	here been changes to the technology used in the production of large resulted in efficiency gains in your firm's large power transfersformer	•
	No	Yes	If yes, please describe these efficiency gains.	

II-3f.	<u>Product shifting</u> Is your firm able to switch production (capacity) between large power transformers and other products (i.e., products other than large power transformers) using the same equipment and/or labor?
	No Yes (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:
II-3g.	<u>Product shifting factors</u> Please describe the factors that affect your firm's ability to shift production capacity between between large power transformers and other products (i.e., products other than large power transformers) (e.g., time, cost, relative price change, qualification or lack thereof, etc.), and the degree to which these factors enhance or constrain such shifts.
II-3h.	<u>Product shifting by MVA rating.</u> —Is your firm able to switch production (capacity) between large power transformers with a rating of 60 to 299 MVA and large power transformers with a rating of 300 MVA or more using the same equipment and/or labor?
	No Yes (i.e., have produced other products or are able to produce other products). Please identify other actual or potential products:
II-3i.	Product shifting factors by MVA rating.—Please describe the factors that affect your firm's ability to shift production capacity between between large power transformers with a rating of 60 to 300 MVA and large power transformers with a rating of 300 MVA or more (e.g., time, cost, relative price change, qualification or lack thereof, etc.), and the degree to which these factors enhance or constrain such shifts.

II-4. **Production, shipment, and inventory data**.--Report your firm's production capacity, production, shipments, and inventories related to the production of large power transformers in its U.S. establishment(s) during the specified periods.

"Average production capacity" or "capacity" – The level of production that your establishment(s) could reasonably have expected to attain during the specified periods. Assume normal operating conditions (i.e., using equipment and machinery in place and ready to operate; normal operating levels (hours per week/weeks per year) and time for downtime, maintenance, repair, and cleanup; and a typical or representative product mix).

"Production" – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

"U.S. commercial shipments" –Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report <u>net values</u> (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

"Internal consumption" – Product consumed internally by your firm. Such transactions are valued at fair market value.

"Transfers to related firms" – Shipments made to related domestic firms. Such transactions are valued at fair market value.

"Related firm" –A firm that your firm solely or jointly owns, manages, or otherwise controls.

"Export shipments" – Shipments to destinations outside the United States, including shipments to related firms.

"Inventories" — Finished goods inventory, not raw materials or work-in-progress.

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the trade data, as Commission staff may contact your firm regarding questions on the trade data. The Commission may also request that your company submit copies of the supporting documents/records (such as production and sales schedules, inventory records, etc.) used to compile these data.

II-4. Production, shipment, and inventory data. --Continued

Quanti	ity (in MVA top	rated); Value	(in 1,000 dollar	s)	
		Calendar year	r	January	-March
Item	2015	2016	2017	2017	2018
Average production capacity ¹ (quantity) (A)					
Beginning-of-period inventories (quantity) (B)					
Production (quantity) (C)					
U.S. shipments: Commercial shipments: quantity (D)					
value (E)					
Internal consumption: ² quantity (F)					
value (G)					
Transfers to related firms: ² quantity (H)					
value (I)					
Export shipments: ³ quantity (J)					
value (K)					
End-of-period inventories (quantity) (L)					
¹ The production capacity reported is b methodology used to calculate production					
² Internal consumption and transfers to valuing these transactions, please specify the value). ³ Identify your firm's principal export management of the second secon	nat basis (e.g., cost	it be valued at fair , cost plus, <i>etc</i> .):	market value. Doe(however, pr	es your firm use a di ovide the data abo	ifferent basis for ve at fair market

II-4. Production, shipment, and inventory data.--Continued

<u>RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.</u>--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and, also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

	Calendar year			January	-March
Reconciliation	2015	2016	2017	2017	2018
B + C - D - F - H - J - L = should equal zero ("0") or provide an explanation. ¹	0	0	0	0	0
¹ Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:					

II-5. <u>Channels of distribution</u>.--Report your firm's commercial U.S. shipments by channel of distribution.

	Quantity (in MVA top rat	red)		
Calendar year			January	_/ -March	
ltem	2015	2016	2017	2017	2018
Channels of distribution: Commercial U.S. shipments to— Distributors (M)					
Utilities (N)					
Other end users (O)					

<u>RECONCILIATION OF CHANNELS.</u>--Please ensure that the quantities reported for channels of distribution (i.e., lines M and N) in each time period equal the quantity reported for commercial U.S. commercial shipments (i.e., line D) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar year			January	y-March
Reconciliation	2015	2016	2017	2017	2018
M + N + O - D = zero ("0"), if					
not revise.	0	0	0	0	0

II-6. <u>Historical U.S. shipments.</u>--Report your firm's U.S. shipments related to the production of large power transformers in its U.S. establishment(s) during the specified periods.

Quantity (in MVA top rated); Value (in 1,000 dollars)			
Calendar year			
Item	2012	2013	2014
U.S. shipments:			
Quantity			
Value			

II-7. <u>U.S. shipments by MVA rating.</u>--Report your firm's U.S. shipments related to the U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of large power transformers during the specified periods.

Item	2015	2016	2017
U.S. shipments:			
60 MVA to 299 MVA			
Quantity (MVA top rated) (P)			
Quantity (<i>Units</i>) (Q)			
Value (<i>\$1,000</i>) (R)			
300 MVA or more			
Quantity (MVA top rated) (S)			
Quantity (<i>Units</i>) (T)			
Value (<i>\$1,000</i>) (U)			

<u>RECONCILIATION OF US SHIPMENTS</u>.--Please ensure that the quantities and value reported for US shipments in this question (i.e., lines P and S and lines R and U) in each time period equal the quantities and value reported for U.S. shipments (i.e., lines D through I) in each time period in question II-4. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

	Calendar year		
Reconciliation	2015	2016	2017
Quantity: P+S-D-F-H=zero			
("0"), if not revise.	0	0	0
Value: R + U – E – G – I = zero			
("0"), if not revise.	0	0	0

ПC	Droducors'	Questionnaire -	Largo power	transformers	/D1\
U.S.	Producers	Questionnaire -	Large bower	transformers	(KT)

II-8a.	Ability and actual production by MVA (top rated) rangeReport whether your firm has the
	capability to product the following categories of large power transformers based on MVA (top-
	rated) in the United States and whether your firm actually produced large power transformers in
	that range.

Item	Able to produce (check if yes)	Actually produced (2012-2017) (check if yes)
60 to 99 MVA		
100 to 199 MVA		
200 to 299 MVA		
300 to 399 MVA		
400 to 499 MVA		
500 to 599 MVA		
600 to 699 MVA		
700 or greater MVA		

II-8b.	Technical limitations impacting firm's ability to produce above the 300 MVA (top-rated)
	thresholdsAre there technical limitations to your firm's ability to produce large power
	transfers with a MVA (top-rated) of more than 300?

No	Yes	If yes, please explain.

II-8c. Economic considerations impacting firm's willingness to produce above the 300 MVA (top-rated) thresholds.-Are there economic considerations that impact your firm's willingness to produce large power transformers above the MVA (top-rated) of more than 300?

No	Yes	If yes, please explain.

			_	_	
U.S.	Producers'	Questionnaire -	Large power	transformers	(R1)

II-9a.	Ability and actual production by kV rangeReport whether your firm has the capability to
	product the following categories of large power transformers based on high line voltage (kV) in
	the United States and whether your firm actually produced large power transformers in that
	range.

Item	Able to produce (check if yes)	Actually produced (2012-2017) (check if yes)
Less than 345 kV		
345 to 499 kV		
500 to 764 kV		
765 kV or greater		

II-9b.	Technical limitations impacting firm's ability to produce above 764 kVAre there technical
	limitations to your firm's ability to produce large power transfers with a high line voltage (kV) of
	more than 764kV?

No	Yes	If yes, please explain.

II-9c. <u>Economic considerations impacting firm's willingness to produce above 764 kV.</u>-Are there economic considerations that impact your firm's willingness to produce large power transformers with a high line voltage (kV) of more than 764kV?

No	Yes	If yes, please explain.

Explanation of trends:

II-10. <u>Employment data</u>.--Report your firm's employment-related data related to the production of large power transformers and provide an explanation for any trends in these data.

"Production and Related Workers" (PRWs) includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to March periods, calculate similarly and divide by 3

"Hours worked" includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

"Wages paid" – Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

	Calendar year		January-March		
Item	2015	2016	2017	2017	2018
Average number of PRWs (number)					
Hours worked by PRWs (1,000 hours)					
Wages paid to PRWs (\$1,000)					

II-11.	<u>Transfers to related firms.</u> If your firm reported transfers to related firms in question II-4, please indicate the nature of the relationship between your firm and the related firms (e.g., joint
	venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

U.S. Pro	ducers' Qu	uestionnaire	e - Large power	transformers (I	R1)		Page 17		
II-12.		='	an imports by yo domestic or imp			se purchased lar	ge power		
	☐ No	No Yes Please indicate the reasons for your firm's purchases (if your firms' reasons differ by source, please elaborate) and report the quantity and value of such purchases below for the specified periods. "Purchase" – A transaction to buy product from a U.S. corporate entity such as another U.S.							
					.S. corporate en irectly imported	•	her U.S.		
	"Import" - record.	-A transacti	on to buy from	a foreign suppl	ier where your f	firm is the impor	ter of		
	Reason fo	r purchases	:						
			Quantity	(in MVA top r	ated)				
				Calendar year	r	January	-March		
ltem			2015	2016	2017	2017	2018		
Purchases for large power Korea ¹		•							
All other s	sources ²								
Purchases fi producers ³									
Purchases fi	rom other	sources ³							
differ by sour ² Please lis	ce, please in	dentify the sources of you	ource for each list r firms purchases	ed supplier: :	·	. If your firm's imp urchased this prod			
II-13.	-		te January 1, 20: tion of large pov			d in a toll agreem	nent		
			roomant hotwo	an two firms w	haraby tha first	firm furnishes tl	h a wa		
	materials			ne raw material	s to produce a p	product that it th			
	materials	and the sec t firm with a	ond firm uses the charge for pro	ne raw material cessing costs, o	s to produce a poverhead, etc.		nen returns		

	II-14.	Forei	gn	trade	zones	
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(a) <u>Firm's FTZ operations</u>.--Does your firm produce large power transformers in and/or admit large power transformers into a foreign trade zone (FTZ)?

"Foreign trade zone" is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designed as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	Yes	If yes Describe the nature of your firms operations in FTZs and identify the specific FTZ site(s).

(b) Other firms' FTZ operations.--To your knowledge, do any firms in the United States import large power transformers into a foreign trade zone (FTZ) for use in distribution of large power transformers and/or the production of downstream articles?

No	Yes	If yesIdentify the firms and the FTZs.

II-15. Imports.--Since January 1, 2012, has your firm imported large power transformers?

"Importer" – The person or firm primarily liable for the payment of any duties on the merchandise, or an authorized agent acting on his behalf.

No	Yes	
		If yes <u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u>

II-16. <u>Imports by an affiliated firm.</u>--Since January 1, 2012, has a firm affiliated with your firm imported large power transformers?

No	Yes	
		If yes— <u>HAVE YOUR AFFLIATED FIRM COMPLETE AND RETURN A U.S.</u> <u>IMPORTERS' QUESTIONNAIRE</u>

				_	
II C	Draducare'	Ouactionnaira	larga paular	trancformore	/D1\
u.s.	Producers	Questionnaire -	Laige Dowei	transionners	ILTI

operations of inventories, research an	or organizat purchases, d developm	tion. Would your firm anticipate any changes in in the character or tion, including its production capacity, production, U.S. shipments, employment, revenues, costs, profits, cash flow, capital expenditure tent expenditures, or asset values relating to the production of large
from Korea		the future if the antidumping duty orders on large power transform
No	Yes	If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentations that address this issue. Include in your response a specific projection of your firm's capacity to produce large power transformers (in MVA top rated) for 2018 and 2019.
that did not the space p	provide a r ovided bel	your firm would like to explain further a response to a question in parrative box, please note the question number and the explanation ow. Please also use this space to highlight any issues your firm had his section, including but not limited to technical issues with the MS

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to David Boyland (202-708-4725,

III-1.	Conta	ct informationPlease identify the re	sponsible individua	al and the manner l	oy which				
	Comm	Commission staff may contact that individual regarding the confidential information submitted							
	in par	t III.							
	Name								
	Title								
	Email								
	Telepl	none							
III-2.	<u>Accou</u>	nting systemBriefly describe your fi	rm's financial acco	unting system.					
	A.	When does your firm's fiscal year er	nd (month and day)	?					
		If your firm's fiscal year changed du	ring the data-colled	tion period, explain	n below:				
	B.1.	Describe the lowest level of operation financial statements are prepared the							
2. Does your firm prepare profit/loss statements for large power transformers:					ers:				
	3.	How often did your firm (or parent company) prepare financial statements (including							
		annual reports, 10Ks)? Please check relevant items below.							
		☐ Audited, ☐ unaudited, ☐ a	nnual reports,] 10Ks,					
		☐ Monthly, ☐ quarterly, ☐ se		annually					
	4.	Accounting basis: GAAP, G	cash, 🔲 tax, or	other compreh	ensive basis of				
		accounting (specify)							
	5.	Report how your firm recognizes retained the specified periods.	venue from the sale	es of large power ti	ransformers in				
				Fiscal year					
		Item	2015	2016	2017				
		ecognized:							
		r date of delivery							
Based or	milesto	ones specified in purchase order ¹							
Other ²									
•		m to 100.0 percent in each column)	0.0	0.0	0.0				
¹ Please	describ	e the most common milestones used f	or revenue recogni	ition when based o	n milestone				
		chase order							
~ Please	describ	e the other revenue recognition meth	od(s) used						

Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes large power transformers, as well as specific statements and worksheets) used to compile these data.

III-3.	<u>Cost accounting system.</u> Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, <i>etc.</i>).						
III-4.	Allocation basisBriefly describe your firm's allocation basis, if an interest expense and other income and expenses. Please include sitems in each category are being allocated; e.g., for COGS: direct roverhead, fixed overhead, etc.	sufficient detail as to	what				
III-5a.	<u>Product listing</u> Please list the products your firm produces in the large power transformers, and provide the share of net sales accoryour firm's most recent fiscal year.		•				
	Products	Share of sales					
	Large power transformers	%					
		%					
		%					
		%					
		%					
III-5b.	Anticipated changes in product listingDo you anticipate that the accounted for by these products will change in the next fiscal year No YesIn the space below, please describe the anticipated change	e share of your firm' ?	s net sales				

Does your firm purchase inputs (raw materials, labor, energy, or any services) used in the production of large power transformers from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?							
large power in question the basis of basis, as elated to							
Share of total COGS							
Input valuation as recorded in the firm's accounting books and records							
om related arge power							
om related							

III-9a. Operations on large power transformers.—Report the revenue and related cost information requested below on the large power transformers operations of your firm's U.S. establishment(s). Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value. Input purchases from related suppliers should be consistent with and based on information in the firm's accounting books and records. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

Quantity (in MVA top rated); Value (in 1,000 dollars)						
	Fiscal year			January	-March	
Item	2015	2016	2017	2017	2018	
Net sales quantities: ² Commercial sales ("CS")						
Internal consumption ("IC")						
Transfers to related firms ("Transfers")						
Total net sales quantities	0	0	0	0	(
Net sales values: ² Commercial sales						
Internal consumption						
Transfers to related firms						
Total net sales values	0	0	0	0	(
Cost of goods sold (COGS): ³ Raw materials (reported in III-9c)	0	0	0	0	(
Direct labor						
Other factory costs						
Total COGS	0	0	0	0	(
Gross profit or (loss)	0	0	0	0	(
Selling, general, and administrative (SG&A) expenses: Selling expenses						
General and administrative expenses						
Total SG&A expenses	0	0	0	0	(
Operating income (loss)	0	0	0	0	(
Other expenses and income: Interest expense						
All other expense items						
All other income items						
Net income or (loss) before income taxes	0	0	0	0	(
Depreciation/amortization included above						
	l.		l .			

¹ Include only sales (whether <u>domestic or export</u>) and costs related to your <u>U.S. manufacturing operations</u>.

Note -- The table above contains calculations that will appear when you have entered data in the MS Word form fields.

² Less discounts, returns, allowances, and prepaid freight. The volume amounts reported should correspond to revenue and cost recognition reflected in this table; i.e., volume reported in this table, depending on revenue recognition approach, may or may not correspond to the shipment quantities and values reported in Part II of this questionnaire.

³ COGS (whether for domestic or export sales) should include <u>costs associated with CS, IC, and Transfers</u>.

term "accessories" in the normal course of business.

III-9b. <u>Historical operations on large power transformers</u>.--Report the revenue and related performance information requested below on the large power transformers operations of your firm's U.S. establishment(s).¹

Quantity (in MVA top rated); Value (in 1,000 dollars)							
	Fiscal years ended						
Item	2012	2013	2014				
Net sales quantity							
Net sales value							
Operating income or (loss)							

III-9c. <u>Inputs reported as raw material</u>.--Report the cost of input materials corresponding to the operations reported in question III-9a.

Value (in \$1,000)						
	Fiscal years ended			January-March		
ltem	2015	2016	2017	2017	2018	
Grain oriented silicon electrical steel (GOES)						
Steel plate						
Dielectric mineral oil						
Controls and accessories						
Windings						
All other raw material inputs						
Total raw material costs (III-9a)	0	0	0	0	0	

If you reported a figure for "Controls and accessories," please explain below how you define the

III-9d.	quantitie have bee return th	ata reconciliationThe calculable line items from question III-9a (i.e., total net sales and values, total COGS, gross profit (or loss), total SG&A, and net income (or loss)) in calculated from the data submitted in the other line items. Do the calculated fields a correct data according to your firm's financial records ignoring non-material as that may arise due to rounding?
	Yes	NoIf the calculated fields do not show the correct data, please double check the feeder data for data entry errors and revise.
		Also, check signs accorded to the post operating income line items; the two expense line items should report positive numbers (i.e., expenses are positive and incomes or reversals are negativeinstances of the latter should be rare in those lines) while the income line item also in most instances should have its value be a positive number (i.e., income is positive expenses or reversals are negative).
		If after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated fields persist please identify and discuss the differences in the space below.

III-10. Nonrecurring items (charges and gains) included in large power transformer financial results.—For each annual and interim period for which financial results are reported in question III-9a, please specify all material (significant) nonrecurring items (charges and gains) in the schedule below, the specific question III-9a line item where the nonrecurring items are included, a brief description of the relevant nonrecurring items, and the associated values (in \$1,000), as reflected in question III-9a; i.e., if an aggregate nonrecurring item has been allocated to question III-9a, only the allocated value amount included in question III-9a should be reported in the schedule below. Note: The Commission's objective here is to gather information only on material (significant) nonrecurring items which impacted the reported financial results of the subject product in question III-9a.

	Calendar years		
	2015	2016	2017
ltem		Value (<i>\$1,000</i>)	
Nonrecurring item 1			
Nonrecurring item 2			
Nonrecurring item 3			
Nonrecurring item 4			
Nonrecurring item 5			
Nonrecurring item 6			
Nonrecurring item 7			

Nonrecurring item: In this table please provide a brief description of each nonrecurring item reported above and indicate the specific line item in table III-9a where the nonrecurring item is classified.

	Description of the nonrecurring item	Income statement classification of the nonrecurring item
Nonrecurring item 1		
Nonrecurring item 2		
Nonrecurring item 3		
Nonrecurring item 4		
Nonrecurring item 5		
Nonrecurring item 6		
Nonrecurring item 7		

<u>records of the company</u> If nonrecurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business; i.e., just as responses to question III-10 identify where these items
are reported in question III-9a.

III-12. Asset values.--Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of large power transformers. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for large power transformers in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations in question III-9a. Provide data as of the end of your firm's three most recently completed fiscal years.

Note: Total assets should reflect <u>net assets</u> after any accumulated depreciation and allowances deducted.

Total assets should be <u>allocated to the subject products</u> if these assets are also related to other products. Please provide a <u>brief explanation if there are any substantial changes</u> in total asset value during the period; e.g., due to asset write-offs, revaluation, and major purchases.

Value (<i>in \$1,000</i>)			
	Fiscal years ended		
Item	2015	2016	2017
Total assets (net) ¹			
¹ If applicable, describe reason(s) for notable changes in total reported assets during period			

If you re detail be	rted total assets on the basis of an allocation method, please describe the allocation i w.	n

III-13. <u>Capital expenditures and research and development expenses.</u>--Report your firm's capital expenditures and research and development expenses for large power transformers. Provide data for your firm's three most recently completed fiscal years, and for the specified interim periods.

		Value (in \$1,000)			
	Fiscal years ended			January-March	
Item	2015	2016	2017	2017	2018
Capital expenditures ¹					
Research and development expenses ²					

¹ Please describe the nature, focus, and significance of your firm's capital expenditures on the subject product. ____

² Please describe the nature, focus, and significance of your firm's R&D expenses related to subject product. _____

III-14.	Data consistency and reconciliation. Please indicate whether your firm's financial data for
	questions III-9a, 12, and 13 are based on a calendar year or your firm's fiscal year:

Calendar year	Fiscal year	Specify fiscal year

Please note the quantities and values reported in question III-9a should, to the extent applicable (see question III-9a (note 2), reconcile with the data reported in question II-4 (including export shipments) as long as they are reported on the same calendar year basis.

RECONCILIATION OF TRADE VS FINANCIAL DATA.--Please ensure, to the extent applicable (see question III-9a (note 2)), that the quantities and values reported for total shipments in part II equal the quantities and values reported for total net sales in part III of this questionnaire in each time period unless the financial data from part III are reported on a fiscal year basis, in which case only the interim periods must reconcile. If the calculated fields below return values other than zero (i.e., "0") and both are being reported on a calendar basis, please explain the discrepancy below.

	Fiscal years ended			January-March	
ltem	2015	2016	2017	2017	2018
Quantity: Trade data from question II-4 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
Value: Trade data from question II-4 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

Do these data in question III-9a reconcile with data in question II-4?

Yes	No	If no, please explain.

III-15.	Other explanationsIf your firm would like to further explain a response to a question in Part III
	that did not provide a narrative box, please note the question number and the explanation in
	the space provided below. Please also use this space to highlight any issues your firm had in
	providing the data in this section, including but not limited to technical issues with the MS Word
	questionnaire.

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from Cindy C	Cohen (202-205-3230,
cindy.cohen@usitc.gov).	

IV-1.	Contact information Please identify the responsible individual and the manner by which
	Commission staff may contact that individual regarding the confidential information submitted
	in part IV.

Name	
Title	
Email	
Telephone	

IV-2. How often do transactions or sales require your firm to go through a qualification process or enter a blanket agreement, as a condition to bid on a particular project?

Item	Always	Frequently	Sometimes	Rarely/Never
Qualification process required				
Blanket agreement required				

IV-3a. <u>Bid Opportunities</u>.--How often is there more than one chance to bid on a particular sales agreement?

Always	Frequently	Sometimes	Rarely/Never

IV-3b. <u>Bid Competition.--</u>How often does the purchaser discuss with you the bids of competing firms (whether or not you disclose who the competition is) in order to get a lower bid price?

Always	Frequently	Sometimes	Rarely/Never

U.S. Pro	oducers' Questionnaire - Large power transformers (R1)	Page
IV-4.	<u>Services Included in Bid</u> Do the bids that you make for LPTs typically include other se	rvices

No	Yes	If yes, describe.
Discount n	oliou Dioas	e describe your firm's discount policies

IV-5.	<u>Discount policy</u> Please describe your firm's discount policies.

such as installation, maintenance, warranties, etc.?

IV-6. Pricing terms.--

What are your firm's typical sales terms for its U.S.-produced large power transformers? (a)

Net 30 days	Net 60 days	2/10 net 30 days	Other	Other (specify)

(b) On what basis are your firm's prices of domestic large power transformers usually quoted (check one)?

Delivered	F.o.b.	If f.o.b., specify point

IV-7. Multiple shipment contracts.--

(a) Please report the approximate share of the value of your firm's sales of its U.S.-produced large power transformers in 2017 by type of contract.

Type of sale	Share of value of 2017 sales
Single shipment contract	%
Blanket/alliance agreement (bidding)	%
Blanket/alliance agreement (private)	%
Multiple shipment individual contract (bidding)	%
Multiple shipment individual contract (private)	%
Total (should sum to 100.0%)	0.0 %

(b)	What is the average number of large power transformers in a multiple-shipn						
	contract?	units					

(c) Absent a change in the specifications or terms of the original agreement (e.g., a change in warranty, purchaser's request for installation, etc.), can prices be renegotiated during the contract period?

No	Yes

(d) If yes, how often are prices renegotiated?

Always	Frequently	Sometimes	Rarely/Never

	D /	0			/D4\
U.S.	Producers	Questionnaire -	Large bower	transformers	(KI)

				•				J		
IV-8.	<u>Lead times</u> What is the average lead time between a customer's order and the date of delivery for your firm's sales of its U.Sproduced large power transformers? days									
IV-9.	Shippin	g informati	<u>ion</u>							
	(a)		What is the approximate percentage of the cost of U.Sproduced large power transformers that is accounted for by U.S. inland transportation costs? %							
	(b)		· -	_	the transportation caser <i>(check one)</i>	n to your firm'	s custon	ners' locations?		
	(c)				e percentage of you		_	e power transformers action facility.		
		Distance	from p	roduc	tion facility	Share				
		Within 1	00 mile	S			%			
		101 to 1	,000 mi	les			%			
		Over 1,0	00 mile	S			%			
		Tota	l (shoul	d sum	to 100.0%)	0.0	%			
	produc	ed idige po			ners since January eographic area	1, 2012 (0.100)	an enac	v if applicable		
	Northeast.–CT, ME, MA, NH, NJ, NY, PA, RI, and VT.									
	Midw	est.–IL, IN, I	A, KS, N	ΛΙ, MN	I, MO, NE, ND, OH	, SD, and WI.				
	South	east.–AL, D	E, DC, F	L, GA,	KY, MD, MS, NC, S	SC, TN, VA, and	d WV.			
	-	al Southwes								
	-				/, NM, UT, and W	′ .				
		CoastCA								
		.–All other r ing AK, HI, F			United States no	t previously lis	ited,			
IV-11.	 End usesHave there been any changes in the end uses of large power transformers since January 1, 2012? Do you anticipate any future changes? 									
Changes in end uses No Yes Explain										
	_	es since y 1, 2012								
	Anticip change									

IV-12. <u>Availability of supply.--</u>Has the availability of large power transformers in the U.S. market changed since January 1, 2012? Do you anticipate any future changes?

Availability in the U.S.		V	Please explain, noting the countries and reasons for the					
market	No	Yes	changes.					
Changes since January 1, 2	Changes since January 1, 2012:							
U.Sproduced product								
Imports from Korea								
Imports from all other countries								
Anticipated changes:								
U.Sproduced product								
Imports from Korea								
Imports from all other countries								

IV-13. <u>Demand trends.</u>-- Indicate how demand within the United States and outside of the United States (if known) for large power transformers has changed since January 1, 2012, and how you anticipate demand will change in the future. Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

Market	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explanation and factors (including any major changes in demand during any particular year since 2012)			
Demand since January 1, 2012								
Within the United States								
Outside the United States								
	Anticipated future demand							
Within the United States								
Outside the United States								

				_	
II C	Draducare'	Ouactionnaira	larga paular	trancformore	/D1\
u.s.	Producers	Questionnaire -	Laige Dowei	transionners	ILTI

Changes in product range, product mix, or marketing	No	Yes	Explain	
Changes since January 1, 2012				
Anticipated changes				
economy-wid transformers	e cond		ers market subject to business cycles (condotror other conditions of competition	_
economy-wid	e cond		Please describe.	_
economy-wid transformers Check all that ap No	e cond	itions)	Please describe. Skip to question IV-16(a).	_
economy-wide transformers Check all that ap No Yes	e cond		Please describe. Skip to question IV-16(a).	_
economy-wide transformers Check all that ap No Yes Yes	ply. Busines Sonal b	ess cyclousiness	Please describe. Skip to question IV-16(a).	
economy-wide transformers Check all that ap No Yes Sea: Yes Con (b) If yes, have the	ply. Busines Sonal b Other ditions	ess cycl busines distinc of con	Please describe. Skip to question IV-16(a). (e.g.	distinctive to large
economy-wide transformers Check all that ap No Yes Sea: Yes Con (b) If yes, have the	ply. Busines Sonal b Other ditions here be ransfor	ess cycl busines distinc of con	Please describe. Skip to question IV-16(a). (e.g. /e etition nanges in the business cycles or conditice January 1, 2012?	distinctive to large

U.S. Pro	U.S. Producers' Questionnaire - Large power transformers (R1) Page 35						
IV-16a.		rnible impa	echnology on firmHave developments relating to smart grid technology ct on your firm's production and sales of large power transformers since				
	No	Yes	If yes, describe.				
IV-16b.	IV-16b. Impact of increase in renewable energy on firmHave developments relating to growth in renewable energy sources had a discernible impact on your firm's production and sales of large power transformers since January 1, 2012?						
	No	Yes	If yes, describe.				
IV-17.	IV-17. Section 232 relief effects						
(a) FamiliarityAre you familiar with the 232 national security investigation or the subsequent imposition of tariffs on imported steel products?							
YesContinue to question IV-17(b). NoContinue to question IV-18.							
(b) <u>Raw materials impact</u> Rate and describe the effect of the announcement of the 232 national security investigation in April 2017 or the subsequent imposition of tariffs on imported steel products in March 2018 on the price of raw materials used to make large power transformers.							

	No/minin	Rati	Describe your rating and the impact of the event			
Factor	1	2	3	Substantia 4	5	(including timing and quantification as applicable)
Announcement of the 232 investigation in April 2017						
Imposition of tariffs on imported steel products in March 2018						

IV-17. Section 232 relief effects.--Continued

(c) Overall conditions impact.--Rate and describe the effect of the announcement of the 232 national security investigation in April 2017 or the subsequent imposition of tariffs on imported steel products in March 2018 on other conditions of competition for large power transformers.

		Rati	Describe your rating and			
	No/minir	mal effect	Substantial effect			the impact of the event (including timing and
Factor	1	2	3	4	5	quantification as applicable)
Announcement of the 232 investigation in April 2017						
Imposition of tariffs on imported steel products in March 2018						

IV-18. <u>Supply constraints</u>.--Has your firm refused, declined, or been unable to supply large power transformers since January 1, 2012 (examples include placing customers on allocation or "controlled order entry," declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.)?

No	Yes	If yes, please describe.

IV-19. <u>Raw materials</u>.--Indicate how large power transformers raw material prices have changed since January 1, 2012, and how you expect they will change in the future.

Raw materials prices	Overall increase	No change	Overall decrease	Fluctuate with no clear trend	Explain, noting how raw material price changes have affected your firm's selling prices for large power transformers.
Changes since January 1, 2012					
Anticipated changes					

IV-20.		kets, if kn	sPlease compare market prices of large power transformers in U.S. and non- nown. Provide specific information as to time periods and regions for any price	
IV-21.	etc. that supply (in States, (2	you are ancluding 2) each of a whole.	Please provide as a separate attachment to this request any studies, surveys, aware of that quantify and/or otherwise discuss large power transformers production capacity and capacity utilization) and demand in (1) the United the other major producing/consuming countries, including Korea, and (3) the Of particular interest is such data from 2012 to the present and forecasts for	
IV-22. Export constraintsDescribe how easily your firm can shift its sales of large power transformation between the U.S. market and alternative country markets. In your discussion, please described any contracts, other sales arrangements, or other constraints that would prevent or retargetime from shifting large power transformers between the U.S. and alternative country mar within a 12-month period.				
IV-23.			Are your firm's exports of large power transformers subject to any tariff or to trade in other countries?	
	No	Yes	If yes, please list the countries and describe any such barriers and any significant changes in such barriers that have occurred since January 1, 2012, or that are expected to occur in the future.	

IV-24. <u>Interchangeability.</u>--Are large power transformers produced in the United States and in other countries interchangeable (i.e., can they physically be used in the same applications)?

Please indicate A, F, S, N, or 0 in the table below:

- A = the products from a specified country-pair are *always* interchangeable
- F = the products are *frequently* interchangeable
- S = the products are *sometimes* interchangeable
- N = the products are *never* interchangeable
- 0 = no familiarity with products from a specified country-pair

Country-pair	Korea	Other countries
United States		
Korea		
	large power transformers that is buntry-pair and explain the facto	

IV-25. **Factors other than price.-**-Are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between large power transformers produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or 0 in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

0 = no familiarity with products from a specified country-pair

Country-pair	Korea	Other countries
United States		
Korea		

For any country-pair for which factors other than price *always* or *frequently* are a significant factor in your firm's sales of large power transformers, identify the country-pair and report the advantages or disadvantages imparted by such factors:

IV-26.	Other explanationsIf your firm would like to further explain a response to a question in Part IV that did not provide a narrative response box, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section, including but not limited to technical issues with the MS Word questionnaire.

HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a "fillable" form in MS Word format on the Commission's website at:

https://www.usitc.gov/investigations/701731/2017/large_power_transformers_korea/f irst_review_full.htm

Please do not attempt to modify the format or permissions of the questionnaire document. Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

• <u>Upload via Secure Drop Box</u>.—Upload the MS Word questionnaire along with a scanned copy of the signed certification page (page 1) through the Commission's secure upload facility:

Web address: https://dropbox.usitc.gov/oinv/ Pin: TRANS

• E-mail.—E-mail the MS Word questionnaire to Nathanael Comly (202-205-3174, nathanael.comly@usitc.gov) or Christopher Robinson (202-205-2542; christopher.robinsonw@usitc.gov), include a scanned copy of the signed certification page (page 1). Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure drop-box system and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm's nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.

If your firm does not produce this product, please fill out page 1, print, sign, and submit a scanned copy to the Commission.

<u>Parties to this proceeding</u>.—If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission's Secretary (202-205-1803). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.