

By Email

NON-CONFIDENTIAL

21 December 2023

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Dear Mr. Dumas,

Re: Large Liquid Dielectric Power Transformers
Request for Initiation of a Normal Value Review or a Re-investigation for the
Purposes of Establishing Normal Values and Export Prices for Subject Goods
Exported by ILJIN Electric Co., Ltd.

These written representations are made on behalf of ILJIN Electric Co., Ltd. ("ILJIN"), whose operations are headquartered in the Republic of Korea ("South Korea").

A. Overview

ILJIN is a manufacturer and exporter of liquid dielectric power transformers, including goods that are subject to the two Canadian anti-dumping measures currently in force concerning: (i) power transformers having a top power handling capacity equal to or greater than 60 MVA ("large power transformers");¹ and (ii) power transformers having a top power handling capacity equal to or greater than 3 MVA, and less than 60 MVA, and having a nominal high voltage rating of 34.5 kV ("small power transformers").² These written representations pertain specifically to the anti-

¹ CBSA, Measures in Force, "Large Power Transformers", available online at <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/tr-eng.html> (pursuant to CITT, Order and Reasons, *Liquid Dielectric Transformers*, Expiry Review No. RR-2017-002 (31 May 2018), available online at <https://decisions.citt-tcce.gc.ca/citt-tcce/a/en/item/354871/index.do>).

² CBSA, Measures in Force, "Small Power Transformers", available online at <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/spt-eng.html> (pursuant to CITT, Findings, *Certain Small Power Transformers*, Inquiry

dumping measure concerning large power transformers, although reference is made to the anti-dumping measure concerning small power transformers.

For the reasons set out below, ILJIN requests the initiation of a normal value review or, in the alternative, a re-investigation for the purposes of establishing [REDACTED] normal values and export prices for ILJIN's future shipments of large power transformers to Canada.³

ILJIN has been assigned [REDACTED] normal values and export prices with respect to small power transformers.⁴ However, with respect to large power transformers, ILJIN has not previously been assigned normal values, export prices, or [REDACTED].

The definitive anti-dumping measure concerning large power transformers from South Korea has been in force for eleven years, since November 2012.⁵ During this time, one re-investigation of normal values and export prices has been conducted, from February to July 2017.⁶ ILJIN did not participate in the original investigation or the re-investigation.⁷

ILJIN has not imported the subject goods into Canada for many years. ILJIN has instead focused on supplying customers in Canada with small power transformers. ILJIN continues to do so in

No. NQ-2021-003 (24 December 2021), available online at <https://decisions.citt-tcce.gc.ca/citt-tcce/a/en/item/518057/index.do>.

³ These written representations are made further to our email correspondence with the CBSA on this matter on 24-25 July 2023.

⁴ **Appendix 01-A (Confidential)**, CBSA, Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021); **Appendix 01-B (Confidential)**, CBSA, Confidential Excel Spreadsheet regarding normal value and export price information, as attached to the Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021), Appendix 6.

⁵ CITT, Statement of Reasons, *Liquid Dielectric Transformers*, Inquiry No. NQ-2012-001 (finding issued 20 November 2012; reasons issued 5 December 2012), available online at <https://decisions.citt-tcce.gc.ca/citt-tcce/a/en/item/353547/index.do>.

⁶ CBSA, Notice of Conclusion of Re-investigation, *Certain Liquid Dielectric Transformers*, Re-investigation No. TR-2017-RI (5 July 2017), available online at <https://www.cbsa-asfc.gc.ca/sima-lmsi/ri-re/tr2017/tr2017-nc-eng.html>.

⁷ In Re-investigation No. TR-2017-RI, initiated on 15 February 2017, ILJIN requested an extension of the deadline to file a response to the request for information ("RFI"). See **Appendix 02-A (Non-confidential)**, Exhibit 015 NC in Re-investigation No. TR-2017-RI ILJIN; and **Appendix 02-B (Non-confidential)**, Exhibit 016 NC in Re-investigation No. TR-2017-RI. In this correspondence, ILJIN noted that there was a considerable amount of documentation that would need to be supplied in response to the RFI questionnaire. Even deploying considerable resources, ILJIN considered that it would not be able to file a proper response within the time available. ILJIN also pointed out that it was pulling the requested information together "from scratch", which placed it at "a great disadvantage". ILJIN expressed concern that its inability to properly respond within the time available would prevent it from participating in the Canadian market. The CBSA declined to grant an extension to ILJIN, explaining that it was unable to do so. The CBSA also explained that it may take into consideration information received after the deadline, time and resources permitting. Under the circumstances, ILJIN found that it was unable to properly participate in the re-investigation. Given that a complete and proper response would require considerable resources, but a late response was unlikely to be taken into consideration, filing after the deadline was not considered a practicable option.

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accordance with the [REDACTED] normal values and export prices issued by the CBSA to ILJIN further to Investigation No. SPT-2021-IN.⁸ ILJIN is committed to fair competition in the Canadian market at non-dumped prices.

In [REDACTED],⁹ contacted ILJIN and requested a price quote and lead time for a large power transformer meeting certain specifications, including a top power-handling capacity of [REDACTED] and a nominal high voltage rating of [REDACTED].¹⁰ This unit is required for the [REDACTED] Project located at the [REDACTED] Substation in [REDACTED].¹¹ In [REDACTED], ILJIN provided a price and technical proposal.¹² To ensure that the price would not be dumped, ILJIN [REDACTED].¹³ Although the preferred delivery date was [REDACTED], ILJIN explained that [REDACTED].¹⁴ The customer in Canada agreed to these terms (subject to minor adjustments) and issued a purchase order in [REDACTED].¹⁵ The agreed purchase price is CAD [REDACTED].¹⁶

Details of the communications and transaction outlined above are provided in Part D., below.

Based on current scheduling, ILJIN estimates that production will be completed in [REDACTED], the unit will be shipped from Korea in [REDACTED], and importation and entry into Canada will occur in [REDACTED].

⁸ **Appendix 01-A (Confidential)**, CBSA, Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021); **Appendix 01-B (Confidential)**, CBSA, Confidential Excel Spreadsheet regarding normal value and export price information, as attached to the Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021), Appendix 6. See also CBSA, Measures in Force, "Small Power Transformers", available online at <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/spt-eng.html>.

⁹ See [REDACTED].

¹⁰ **Appendix 04-A (Confidential)**, *Correspondence between Canadian customer and ILJIN*, pp. 6-7 (email correspondence from [REDACTED] to Jeongoh "James" Bae, Sales Manager, ILJIN, dated [REDACTED]).

¹¹ **Appendix 04-B (Confidential)**, Project and Site Information [REDACTED].

¹² **Appendix 04-A (Confidential)**, *Correspondence between Canadian customer and ILJIN*, p. 1 (email correspondence from Jeongoh "James" Bae, Sales Manager, ILJIN, to [REDACTED] dated [REDACTED]).

¹³ As explained below, the total agreed price to the customer in Canada is CAD [REDACTED]. Estimated costs of production are CAD [REDACTED], and estimated freight, insulation oil, and installation amount to CAD [REDACTED]. [REDACTED]. The [REDACTED]. In comparison, in 2023, ILJIN's estimated [REDACTED].

¹⁴ **Appendix 04-A (Confidential)**, *Correspondence between Canadian customer and ILJIN*, pp. 1 and 7.

¹⁵ **Appendix 05 (Confidential)**, Customer Purchase Order [REDACTED].

¹⁶ **Appendix 05 (Confidential)**, Customer Purchase Order [REDACTED], p. 6 of 8 ([REDACTED]).

Proactively establishing [REDACTED] the normal value and export price for the unit at this early stage, well in advance of its importation into Canada, will preserve the interests protected by the SIMA measure while avoiding the administrative and financial burdens that would otherwise be imposed in a post-entry process for re-determination of normal value and export price. This is discussed in more detail in Part E., below.

B. Information about ILJIN's business operations

ILJIN's headquarters are located at the ILJIN Building, 45, Mapo-daero, Mapo-gu, in the city of Seoul, South Korea. ILJIN's Hongseong factory, where ILJIN manufactures power transformers and other heavy electric power equipment, is located at 561 Chwisaen-ri Hongseong-gun, Chungcheongnam-do, South Korea (the "Hongseong factory").

Originally established in 1968, ILJIN Electric Co., Ltd. has developed into a specialized manufacturer and global supplier of equipment and materials for the electric power industry.¹⁷ Today, ILJIN focuses on the production of heavy equipment for the transmission and distribution of electric power (including transformers, gas insulated switchgears ("GIS"), reclosers, etc.) as well as cables and other materials designed and manufactured for use in extra-high voltage electric power systems.¹⁸

ILJIN supplies these products to electric power utilities and private industries in its domestic market in South Korea as well as in export markets in 80 countries throughout the world.¹⁹

ILJIN has been publicly listed on the Korean Stock Exchange since August 2008. It is owned by ILJIN Holdings, which functions as the holding company of all ILJIN Group entities.

In North America, ILJIN's associated company, ILJIN Electric USA Inc. ("ILJIN USA"), performs sales functions on ILJIN's behalf, operating as the importer and distributor of ILJIN's products in the United States and Canadian markets. ILJIN USA's headquarters are located at 15995 North Barkers Landing Road, Suite 310, in the city of Houston, Texas.

C. Information about ILJIN's sales of power transformers to Canada

The following explains how ILJIN markets, sells, produces, and exports power transformers for customers in North America, including Canada. [REDACTED] ILJIN's business in Canada has [REDACTED]. The

¹⁷ ILJIN Electric, Company, About Us, Overview, available online at <https://www.iljinelectric.com/eng/company/intro.jsp>;

¹⁸ ILJIN's brochure for power transformers is attached as **Appendix 03 (Public)**.

¹⁹ ILJIN Electric, Company, About Us, Overview, available online at <https://www.iljinelectric.com/eng/company/intro.jsp>; ILJIN Electric, Company, About Us, History, available online at https://www.iljinelectric.com/eng/company/history_01.jsp.

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information set out below, [REDACTED] applies to units falling within the product definition of large power transformers.²⁰

ILJIN USA is responsible for assisting ILJIN with marketing, sales, contracting, and customer service functions in North America. When a Request for Quotations (“RFQ”) is received from a North American customer, ILJIN [REDACTED]. Once clarifications concerning product specifications, delivery timeframes, and other contractual terms are resolved with the customer, [REDACTED] a price quotation.

The quotation process begins with ILJIN's engineers, who use the customer's specifications to draft an initial design. Based on the initial design, ILJIN [REDACTED]. Next, ILJIN [REDACTED] price quotation that is submitted to the customer.

Customers often request [REDACTED]. This leads to [REDACTED] a sales contract and/or purchase order [REDACTED].

In all sales to Canada, the payment terms [REDACTED]. The delivery terms are [REDACTED].

Upon receiving a concluded sales agreement and/or purchase order from a customer, [REDACTED]. The price specified in this order is the [REDACTED].

²⁰ This information is consistent with the information that ILJIN provided in its responses to the CBSA's questionnaire responses in Investigation No. SPT-2021-IN concerning small power transformers. See Exhibits 043 PRO and 044 NC, SPT 2021 IN, Response to request for information (RFI) from ILJIN Electric USA, Inc.; Exhibits 059 PRO and 060 NC, SPT 2021 IN, Response to request for information (RFI) – dumping from ILJIN Electric Co., Ltd.; Exhibits 122 PRO and 123 NC, SPT 2021 IN, Response to supplemental request for information (SRFI) #1 from ILJIN Electric USA, Inc.; Exhibits 130 PRO and 131 NC, Response to supplemental request for information (SRFI) #1 from ILJIN Electric Co., Ltd.; Exhibits 245 PRO and 246 NC, SPT 2021 IN, Response to supplemental request for information (SRFI) #2 from ILJIN Electric Co., Ltd. (as listed online at <https://www.cbsa-asfc.gc.ca/sima-lmsi/i-e/spt2021/spt2021-ex-eng.html>).

].

The amount of []. For example, where the [].

The table below summarizes this transactional structure.

| Transactional Stage | Parties | Value |
|---------------------|---------|-------|
| 1. [] | [] | [] |
| 2. [] | [] | [] |

Once an order is established, ILJIN's engineers begin [].

Once the final design and specifications are approved by the customer, ILJIN []. The materials and components used to manufacture a power transformer include: [], and other parts.

The total lead time depends on a number of factors, including: (i) []; (ii) []; and (iii) the size and complexity

of the unit (with larger and more complex units generally requiring more time to manufacture and test).

Most customers require [REDACTED]. Some customers also require [REDACTED].

All transformers that ILJIN manufactures are thoroughly tested to verify that they meet customer specifications. ILJIN's facilities at the Hongseong factory are capable of performing all tests required for international standards, such as those set by the International Electrotechnical Commission ("IEC"), the American National Standards Institute and the Institute of Electronics Engineers ("ANSI/IEEE"), and the Canadian Standards Association ("CSA"), etc.

Once factory testing is completed, ILJIN engineers [REDACTED]. Generally, ILJIN is responsible, as the manufacturer and exporter, for [REDACTED].

When the unit arrives at the Canadian port, ILJIN USA imports the unit [REDACTED]. As indicated above, [REDACTED]. Once the unit arrives at the customer's site, [REDACTED].

Throughout this process, ILJIN USA [REDACTED].

D. ILJIN's Pending Export of a Large Power Transformer to Canada

ILJIN is scheduled to deliver a large power transformer to a customer in Canada in [REDACTED]. To support ILJIN's request for the initiation of a normal value review (or, in the alternative, a re-investigation) to establish [REDACTED] normal value and export price, the circumstances and details of the sale are outlined below.

In [REDACTED] contacted ILJIN to request a price quote and the best lead time available for a large power transformer.²¹ [REDACTED]

²¹ **Appendix 04-A (Confidential)**, *Correspondence between Canadian customer and ILJIN*, pp. 6-7 (email correspondence from [REDACTED] to Jeongoh "James" Bae, Sales Manager, ILJIN, dated [REDACTED]).

[REDACTED]. ILJIN is a long-established supplier of small power transformers [REDACTED], including in accordance with the [REDACTED] normal values and export prices issued by the CBSA to ILJIN further to Investigation No. SPT-2021-IN.²²

The specifications of the required unit include a top power-handling capacity of [REDACTED] and a nominal high voltage rating of [REDACTED].²³ This transformer is required for the [REDACTED] Project located at the [REDACTED] Substation in [REDACTED].²⁴

Although some of the documents enclosed include boilerplate terms like [REDACTED] and [REDACTED], this was [REDACTED]. The customer communicated to ILJIN USA's sales team that [REDACTED].

In [REDACTED], ILJIN provided a price and technical proposal.²⁵ The customer's preferred delivery date was [REDACTED]. ILJIN explained that [REDACTED].²⁶ At that time, ILJIN [REDACTED]. The customer in Canada agreed to these terms (subject to minor adjustments) and issued a purchase order in [REDACTED].²⁷ The agreed purchase price is CAD [REDACTED].²⁸ This price consists of the following components, [REDACTED]:

²² **Appendix 01-A (Confidential)**, CBSA, Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021), Appendix 6; **Appendix 01-B (Confidential)**, CBSA, Confidential Excel Spreadsheet regarding normal value and export price information, as attached to the Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021), Appendix 6. See also CBSA, Measures in Force, "Small Power Transformers", available online at <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/spt-eng.html>.

²³ **Appendix 04-A (Confidential)**, *Correspondence between Canadian customer and ILJIN*, pp. 6-7 (email correspondence from [REDACTED] to Jeongoh "James" Bae, Sales Manager, ILJIN, dated [REDACTED]). In describing these specifications, the customer observed that the [REDACTED]. This refers to [REDACTED].

²⁴ **Appendix 04-B (Confidential)**, Project and Site Information [REDACTED].

²⁵ **Appendix 04-A (Confidential)**, *Correspondence between Canadian customer and ILJIN*, p. 1 (email correspondence from Jeongoh "James" Bae, Sales Manager, ILJIN, to [REDACTED] dated [REDACTED]); **Appendix 04-D (Confidential)**, Price Schedule; **Appendix 04-E (Confidential)**, Technical Proposal and Initial Design; **Appendix 04-F (Confidential)**, Technical Proposal ([REDACTED]).

²⁶ **Appendix 04-A (Confidential)**, *Correspondence between Canadian customer and ILJIN*, pp. 1 and 7.

²⁷ **Appendix 05 (Confidential)**, Customer Purchase Order [REDACTED].

²⁸ **Appendix 05 (Confidential)**, Customer Purchase Order [REDACTED], p. 6 of 8 ([REDACTED]).

| Price Component | Value (CAD) |
|--|-------------|
| Estimated costs of production (materials and labour) | [REDACTED] |
| Estimated inland freight and handling in Korea | [REDACTED] |
| Estimated ocean freight + insurance | [REDACTED] |
| Estimated inland freight in Canada | [REDACTED] |
| Estimated insulation oil | [REDACTED] |
| Estimated installation (including supervision) | [REDACTED] |
| Estimated profit | [REDACTED] |
| [REDACTED] | [REDACTED] |
| Total | [REDACTED] |

[REDACTED] in the amount of [REDACTED], which reflects [REDACTED].²⁹ In accordance with the [REDACTED].

Manufacturing costs have increased substantially over the last three years, and [REDACTED]. For example, the primary materials used to produce power transformers are copper and grain-oriented silicon steel. The costs of these materials have increased sharply over the last three years. **Confidential Appendix 07** shows the trends in (i) copper pricing, and (ii) the average price at which ILJIN has procured grain-oriented silicon steel sheet.³⁰ ILJIN forecasts that these costs are likely to remain relatively stable, although at high levels, over the next 12 months.

To ensure that the price would not be dumped, ILJIN [REDACTED]. As indicated in the table above, [REDACTED] is CAD [REDACTED]. This constitutes about [REDACTED]. In comparison, ILJIN's estimated [REDACTED] in 2023 for domestic sales of large power transformers to customers in South Korea is: [REDACTED]

²⁹ **Appendix 06 (Confidential)**, ILJIN Purchase Order [REDACTED].

³⁰ **Appendix 07 (Confidential)**, Price Trends of Raw Materials. These data show that copper prices increased dramatically from 2020-2021, peaked in 2022, and fluctuated until stabilizing somewhat in 2023. The current price of copper remains at a higher level than in 2017. ILJIN expects copper prices to remain relatively stable for the mid-term future. Similarly, ILJIN's costs for grain-oriented steel have [REDACTED] since 2020.

[REDACTED].

Further, based on the unit's top power handling capacity of [REDACTED], the customer's total purchase price works out to approximately CAD [REDACTED] per MVA, and the [REDACTED]. In comparison, ILJIN sells large power transformers with a top power handling capacity of [REDACTED]. This converts to about CAD [REDACTED] at the current exchange rate.

For the purposes of comparison, the tables below summarize ILJIN's domestic sales of large power transformers to customers in South Korea in recent years. Additional detail is provided in **Confidential Appendix 08**.³¹

| Domestic Sales to Utility Customers ([REDACTED]) | | | | | |
|--|--------------|------------|-------------------------|-------------------|------------|
| | No. of Units | Total MVA | Total Sales Value (KRW) | Total Costs (KRW) | Profit |
| 2021 | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| 2022 | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| 2023 Q1-Q3 | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |

| Domestic Sales to Other Customers (e.g., [REDACTED]) | | | | | |
|---|--------------|------------|-------------------------|-------------------|------------|
| | No. of Units | Total MVA | Total Sales Value (KRW) | Total Costs (KRW) | Profit |
| 2021 | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| 2022 | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| 2023 Q1-Q3 | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |

³¹ See **Appendix 08 (Confidential)**, Summary of Domestic Sales of Large Power Transformers.

E. ILJIN's Request for [REDACTED] Normal Value and Export Price

ILJIN submits these written representations to formally request a normal value review to establish [REDACTED] normal values and export prices for ILJIN's future shipments of large power transformers to Canada.³² This request is made in accordance with the CBSA's policy, as described in Memorandum D14-1-8, which provides that "normal value reviews are administrative proceedings conducted to", *inter alia*, "establish values for exporters that do not currently have values."³³

In the context of Investigation No. SPT-2021-IN concerning small power transformers, the CBSA found that it was necessary to establish a [REDACTED] normal values and export prices for future shipments [REDACTED]. In this regard, the CBSA explained as follows in the confidential exporter letter issued to ILJIN on 25 November 2021:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].³⁴

ILJIN submits that, for the same reasons as those outlined by the CBSA in the above-referenced passage, it is appropriate to establish [REDACTED] normal values and export prices for ILJIN's future shipments of large power transformers to Canada. In terms of marketing, sales, contracting, design, materials, manufacturing, shipment, importation, delivery, installation, payment terms, and all other relevant considerations, there is no difference between units that meet the product definition of large power transformers (i.e., liquid dielectric transformers having a top power handling capacity equal to or greater than 60 MVA) and units that meet the product definition of small power transformers.

Establishing [REDACTED] normal value and export price in this manner will ensure that, when the large power transformer for the [REDACTED] Project is imported into Canada in [REDACTED], either: (i) no anti-dumping duty will be applied because no

³² These representations are made further to the CBSA's recommendation related to this matter, which is "to submit representation requesting an NVR" (email correspondence dated 24 July 2023).

³³ CBSA, Memorandum D14-1-8, "Re-investigation and Normal Value Review Policy – *Special Import Measures Act* (SIMA)", ISSN 2369-2391 (21 September 2022), para. 2, available online at <https://www.cbsa-asfc.gc.ca/publications/dm-md/d14/d14-1-8-eng.html>.

³⁴ **Appendix 01-A (Confidential)**, CBSA, Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021), Appendix 6, p. 1 (PDF p. 16 of 17, 1st para. See also **Appendix 01-B (Confidential)**, Confidential Excel Spreadsheet regarding normal value and export price information, as attached to the Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021), Appendix 6.

dumping has occurred;³⁵ or (ii) anti-dumping duty will only be applied to the extent that the unit's normal value exceeds the export price (i.e., the margin of dumping).

Under the circumstances, a normal value review would be the most appropriate mechanism to establish [REDACTED] normal value and export price. The expedited review procedure under section 13.2 of the *Special Import Measures Act* ("SIMA") does not appear to be available to ILJIN in this case.³⁶

ILJIN is aware of the mechanism under paragraph 56(1.01)(a) of the SIMA whereby ILJIN USA, as the importer, could request a re-determination of the normal value and export price *after* importing the future shipment and paying all duties owing — including anti-dumping duty at the rate equal to 101% of the export price. However, given the extremely high value of liquid dielectric power transformers, as heavy capital machinery that is custom-designed and manufactured to order, this approach is impracticable due to the extremely heavy financial burden that would be imposed.³⁷

In this case, anti-dumping duty equal to 101% of the export price (i.e., CAD [REDACTED], less amounts for ocean freight and insurance, etc.) would amount to more than CAD [REDACTED]. It is well-established that: "[a]n importer may submit a [re-determination] request to the CBSA only if all duties owing on the goods have been paid"; and "[t]he CBSA will reject requests when importers have not paid the duties for the goods at issue".³⁸ Therefore, LJIN USA would be required to sustain the financial burden of paying more than [REDACTED] in cash for the duration of the post-entry re-determination process.

Moreover, where the re-determination establishes that the large power transformer was imported into Canada at an undumped price, the CBSA will issue a full refund to ILJIN USA together with

³⁵ Due to the [REDACTED] specifically to ensure an undumped price, ILJIN believes that this is the most likely outcome.

³⁶ Given that ILJIN requested an extension of the deadline to file a questionnaire response in Re-investigation No. TR-2017-RI, it seems likely that ILJIN was "requested to provide information" in relation to the subject goods within the meaning of subparagraph 13.2(1)(b)(ii). If so, ILJIN would not meet the eligibility criterion set forth in that paragraph. We note that the criteria set forth in paragraph 13.2(1)(a), and subparagraphs 13.2(1)(b)(i) and 13.2(1)(b)(ii) are cumulative. An exporter will not be eligible for the expedited review procedure unless it meets all three criteria. Thus, even where ILJIN was not "given notice under subparagraph 34(1)(a)(i) [*initiation of the original investigation*], paragraph 38(3)(a) [*preliminary determination of dumping*] or subsection 41(3) [*final determination of dumping*]" during the original investigation, and would therefore satisfy the eligibility criteria in paragraph 13.2(1)(a) and subparagraph 13.2(1)(b)(i), it would not be eligible to the extent that the criterion in subparagraph 13.2(1)(b)(ii) is not met.

³⁷ These problems do not arise with respect to most of the other products covered by SIMA measures (e.g., commodities). This is because the amount of the anti-dumping duty paid to initiate a post-entry re-determination process can be minimized by importing a very small quantity of the subject goods (i.e., a "test" shipment). Unfortunately, this approach is not tenable for power transformers due to the extremely high price *per unit* combined with the high rate of duty (equal to 101% of the export price).

³⁸ CBSA, Memorandum D14-1-3, "Re-determinations and Appeals Under the Special Import Measures Act", ISSN 2369-2391 (18 August 2023), para. 6, available online at <https://www.cbsa-asfc.gc.ca/publications/dm-md/d14/d14-1-3-eng.html>.

interest at the prescribed rate (currently 4.9940%,³⁹ which equates to approximately CAD [REDACTED] per month before compounding).

By proactively establishing [REDACTED] normal value and export price before the unit is imported, a normal value review would avoid imposing these unnecessary financial burdens. Further, given the long lead time before the scheduled entry of the unit in [REDACTED], there is some flexibility available in terms of the timing of a normal value review. This scheduling flexibility is lost in the event of recourse to a post-entry request for re-determination. In sum, while a normal value review and a post-entry request for re-determination would constitute similar procedures, ultimately arriving at the same outcome, a normal value review would avoid the unnecessary financial and administrative burdens of a post-entry re-determination, while ensuring the integrity and effectiveness of the SIMA measures.

Finally, if the CBSA initiates a full re-investigation in 2024, this would also be sufficient for the purposes of establishing [REDACTED] normal values and export prices for ILJIN's incoming large power transformer, provided that such a re-investigation is concluded before importation of the unit discussed above. In this regard, ILJIN and ILJIN USA confirm that they would fully participate in such a re-investigation.

F. Conclusion

ILJIN is prepared to provide any additional information that the CBSA may require in relation to this matter and will fully cooperate with all enquiries. ILJIN is committed to participation in the Canadian market at prices that are not dumped. By proactively establishing [REDACTED] determining the normal value and export price at an early stage, long before the unit is scheduled to arrive in Canada, ILJIN is seeking to comply with the SIMA measure and cooperate with the CBSA in a manner that minimizes administrative and financial burdens.

In this regard, a post-entry request for re-determination of normal value and export price would result in an excessive anti-dumping duty payment, a proceeding for re-determination of normal value and export price, and likely a refund and substantial interest payment issued to ILJIN at the end of the process. ILJIN submits that a normal value review, concluded at the CBSA's convenience over the next 12-16 months (prior to the scheduled importation date), would avoid these unnecessary burdens while preserving the integrity of the SIMA measure and the interests that it protects.

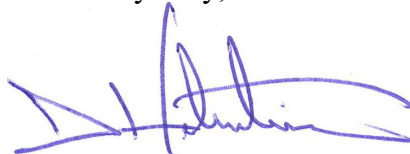
On behalf of ILJIN, we reserve the right to reply to any submissions that may be made by interested parties in response to these written representations.

³⁹ CBSA, "Interest Rates Table", available online at https://cicp-pcid.cbsa-asfc.cloud-nuage.canada.ca/?lang=en_CA (October 1 – December 31, 2023, prescribed interest rate).

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Should you require any additional information, please do not hesitate to contact the undersigned.

Yours very truly,



Tereposky & DeRose LLP
Daniel Hohnstein

Encls.

LIST OF APPENDICES

| Appendix No. | Document | Confidentiality Designation |
|---------------------|--|------------------------------------|
| 1-A | CBSA, Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021) | Confidential |
| 1-B | CBSA, Confidential Excel Spreadsheet regarding normal value and export price information, as attached to the Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021), Appendix 6. | Confidential |
| 2-A | Exhibit 015 NC in Re-investigation No. TR-2017-RI | Non-confidential |
| 2-B | Exhibit 016 NC in Re-investigation No. TR-2017-RI | Non-confidential |
| 3 | Iljin Electric Co., Ltd., "Power Transformer and Shunt Reactor", Product Catalogue (March 2022) | Public |
| 4-A | Correspondence between Canadian customer and ILJIN | Confidential |
| 4-B | Project and Site Information | Confidential |
| 4-C | On-Site Work RACI Chart | Confidential |
| 4-D | Price Schedule | Confidential |
| 4-E | Technical Proposal and Initial Design | Confidential |
| 4-F | Technical Proposal | Confidential |
| 5 | Customer Purchase Order | Confidential |

NON-CONFIDENTIAL

| | | |
|----------|---|---------------------|
| 6 | ILJIN Purchase Order | Confidential |
| 7 | Price Trends of Raw Materials | Confidential |
| 8 | Summary of Domestic Sales of Large Power Transformers | Confidential |

APPENDIX 1-A (Non-Confidential)

CBSA, Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021)

This appendix has been designated confidential in its entirety. This appendix consists of a letter that was issued to ILJIN Electric Co., Ltd. (ILJIN) on a confidential basis because it contains commercially sensitive confidential business information concerning the pricing of ILJIN's "small power transformers", including in relation to normal value, export price, and other details. We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and/or ILJIN's customers if it were disclosed or otherwise made available to ILJIN's competitors. As such, the contents of this document are not included in the non-confidential version.

APPENDIX 1-B (Non-Confidential)

CBSA, Confidential Excel Spreadsheet regarding normal value and export price information, as attached to the Confidential Exporter Letter issued to ILJIN Electric Co., Ltd. (25 November 2021), Appendix 6.

*This appendix has been designated confidential in its entirety. It consists of an Excel spreadsheet that was issued to ILJIN Electric Co., Ltd. (ILJIN) on a confidential basis together with the letter attached as **Confidential Appendix 1-A**. It contains commercially sensitive confidential business information concerning the pricing of ILJIN's "small power transformers", including in relation to normal value, export price, and other details. We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and/or ILJIN's customers if it were disclosed or otherwise made available to ILJIN's competitors. As such, the contents of this document are not included in the non-confidential version.*

This Appendix is provided as a separate document in Excel format.

APPENDIX 2-A (Non-Confidential)

Exhibit 015 NC in Re-investigation No. TR-2017-RI

Rousseau, Melanie

From: Fast, Laura
Sent: February 22, 2017 11:45 AM
To: 'Peter Rothwell'
Cc: leejg@iljin.co.kr; Kurt Cho (donghee.cho@iljin.co.kr); hyunhak.chung@iljin.co.kr; rachael.yeon@iljin.co.kr
Subject: RE: Canada Border Services Agency (CBSA) - Liquid Dielectric Transformers - Initiation of a Re-investigation

Categories: Yellow Category

Hi Peter,

Thank you for confirming receipt of the RFI on behalf of Iljin. Unfortunately, due to the tight timelines of the re-investigation, the CSBA is unable to grant an extension to the due date. While the CBSA is unable to grant an extension, it may take into consideration information received after March 24, 2017, time and resources permitting. However, at this point and time, the CBSA is unable to give any guarantees.

Regards,

Laura Fast

Program Officer, Consumer Products Division, Trade and Anti-dumping Programs Directorate
Canada Border Services Agency/ Government of Canada
Laura.Fast@cbsa-asfc.gc.ca/ Tel: 613-954-1641

Agente de programme, Division des produits de consommation, Direction des programmes commerciaux et antidumping
Agence des services frontaliers du Canada / Gouvernement du Canada
Laura.Fast@cbsa-asfc.gc.ca/ Tél. : 613-954-1641

From: Peter Rothwell [mailto:prothwell@igbtech.com]
Sent: February 21, 2017 6:22 PM
To: Fast, Laura <Laura.Fast@cbsa-asfc.gc.ca>
Cc: leejg@iljin.co.kr; Kurt Cho (donghee.cho@iljin.co.kr) <donghee.cho@iljin.co.kr>; hyunhak.chung@iljin.co.kr; rachael.yeon@iljin.co.kr
Subject: RE: Canada Border Services Agency (CBSA) - Liquid Dielectric Transformers - Initiation of a Re-investigation

Hi Laura

Iljin has received this and their group had an initial meeting for the requirements to the RFI. Due to the amount of information required, they have requested an extension to 24-Apr from 24-Mar for the submission deadline. They want to make sure to supply all the information that is required and the additional time would greatly help them.

We hope this request does not cause any problems with the timelines of the investigation and that you can grant it. We await your response and thank you for your consideration.

Regards,



Peter Rothwell, President | IGB Technologies Inc. | Suite 1120, 13 Mission Avenue, St. Albert, AB T8N 1H6
P: 780-456-3128 | C: 780-920-7787 | F: 780-456-3168 | E: prothwell@IGBTech.com | W: www.IGBTech.com

From: Fast, Laura [<mailto:Laura.Fast@cbsa-asfc.gc.ca>]

Sent: February 17, 2017 12:22 PM

To: Peter Rothwell <prothwell@igbtech.com>

Subject: RE: Canada Border Services Agency (CBSA) - Liquid Dielectric Transformers - Initiation of a Re-investigation

Hi Peter,

As discussed, I have attached a copy of the dumping Request For Information (RFI) that was emailed to Iljin this afternoon.

Have a good weekend,
Laura

Laura Fast

Program Officer, Consumer Products Division, Trade and Anti-dumping Programs Directorate
Canada Border Services Agency/ Government of Canada
Laura.Fast@cbsa-asfc.gc.ca/ Tel: 613-954-1641

Agente de programme, Division des produits de consommation, Direction des programmes commerciaux et antidumping
Agence des services frontaliers du Canada / Gouvernement du Canada
Laura.Fast@cbsa-asfc.gc.ca/ Tél. : 613-954-1641

From: Peter Rothwell [<mailto:prothwell@igbtech.com>]

Sent: February 17, 2017 11:38 AM

To: Fast, Laura

Cc: Tian, Wayne; Kurt Cho (donghee.cho@iljin.co.kr); Jun Lee; hyunhak.chung@iljin.co.kr; rachael.yeon@iljin.co.kr

Subject: RE: Canada Border Services Agency (CBSA) - Liquid Dielectric Transformers - Initiation of a Re-investigation

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It was great to talk to you this morning and thank you for answering my questions and giving me a better understanding of the process.

Can you please make sure you are contacting the following people at Iljin as they are the main people involved with the Canadian Market and will be the ones supplying the information to you:

Mr. Jun Lee: leejg@iljin.co.kr

Mr. Kurt Cho: donghee.cho@iljin.co.kr

Mr. Brody Chung: hyunhak.chung@iljin.co.kr

Ms. Rachael Yeon: rachael.yeon@iljin.co.kr

I have copied them on this email as well. We look forward to working with you on the anti-dumping issue.

Regards,



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P: 780-456-3128 | C: 780-920-7787 | F: 780-456-3168 | E: prothwell@IGBTech.com | W: www.IGBTech.com

From: Fast, Laura [<mailto:Laura.Fast@cbsa-asfc.gc.ca>]
Sent: February 15, 2017 10:01 AM
To: 'prothwell@CPResistors.com' <prothwell@CPResistors.com>
Cc: Tian, Wayne <Wayne.Tian@cbsa-asfc.gc.ca>
Subject: Canada Border Services Agency (CBSA) - Liquid Dielectric Transformers - Initiation of a Re-investigation

Dear Mr. Rothwell:

For your information, please be advised that the CBSA has today initiated a re-investigation, in accordance with the *Special Import Measures Act*, of the normal values and export prices respecting liquid dielectric transformers originating in or exported from the Republic of Korea. A notification can be found on our website at <http://www.cbsa.gc.ca/sima-lmsi/menu-eng.html>. A dumping request for information has been sent by mail to Iljin Electric Co. Ltd.

Please feel free to contact myself or Wayne Tian at 613-946-2574 (Wayne.Tian@cbsa-asfc.gc.ca) if you have any questions.

Regards,

Laura Fast

Program Officer, Consumer Products Division, Trade and Anti-dumping Programs Directorate
Canada Border Services Agency/ Government of Canada
Laura.Fast@cbsa-asfc.gc.ca/ Tel: 613-954-1641

Agente de programme, Division des produits de consommation, Direction des programmes commerciaux et antidumping
Agence des services frontaliers du Canada / Gouvernement du Canada
Laura.Fast@cbsa-asfc.gc.ca/ Tél. : 613-954-1641

APPENDIX 2-B (Non-Confidential)

Exhibit 016 NC in Re-investigation No. TR-2017-RI

Rousseau, Melanie

From: Fast, Laura
Sent: March 1, 2017 02:53 PM
To: 'Peter Rothwell'
Cc: leejg@iljin.co.kr; Kurt Cho (donghee.cho@iljin.co.kr); hyunhak.chung@iljin.co.kr; rachael.yeon@iljin.co.kr
Subject: RE: Canada Border Services Agency (CBSA) - Liquid Dielectric Transformers - Initiation of a Re-investigation
Categories: Yellow Category

Hi Peter,

The schedule for the re-investigation was determined based on available resources, current workload, and anticipated future workload. The schedule is set so that the CBSA has sufficient time to analyze and verify the information and perform the necessary calculations by the scheduled conclusion date. As such, the CBSA cannot significantly alter the re-investigation schedule. The timeframe of 37 days for exporters to respond to Requests for Information (RFI) is consistent with Canada's obligations under the WTO and is the same whether it is an initial investigation or re-investigation. Extensions of time of a few days to respond to Requests for Information are granted only in situations in which there is an unusual burden or unforeseen circumstances. Having not previously replied to an RFI does not justify the granting of an extension of time. As a result, the CBSA is unable to grant the requested extension of 60 days to respond to the RFI. While the CBSA is unable to grant an extension, it may take into consideration information received after March 24, 2017, time and resources permitting.

Regards,

Laura Fast

Program Officer, Consumer Products Division, Trade and Anti-dumping Programs Directorate
Canada Border Services Agency/ Government of Canada
Laura.Fast@cbsa-asfc.gc.ca/ Tel: 613-954-1641

Agente de programme, Division des produits de consommation, Direction des programmes commerciaux et antidumping
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Laura.Fast@cbsa-asfc.gc.ca/ Tél. : 613-954-1641

From: Peter Rothwell [mailto:prothwell@igbtech.com]
Sent: March 1, 2017 1:39 AM
To: Fast, Laura <Laura.Fast@cbsa-asfc.gc.ca>
Cc: leejg@iljin.co.kr; Kurt Cho (donghee.cho@iljin.co.kr) <donghee.cho@iljin.co.kr>; hyunhak.chung@iljin.co.kr; rachael.yeon@iljin.co.kr
Subject: RE: Canada Border Services Agency (CBSA) - Liquid Dielectric Transformers - Initiation of a Re-investigation

Hi Laura

Iljin has now thoroughly reviewed the required documentation for the re-investigation. There is a considerable amount of documentation that needs to be supplied for your RFI.

Even with deploying considerable resources at this. Unfortunately, because of the amount of documentation, Iljin feels it is not realistic for them to properly respond within the time frame set out in the RFI.

We wanted to point out to you that unlike some of the other South Korean manufacturers that would already have much of the information pulled together from the previous investigation, Iljin is pulling this information together from scratch. We feel this puts us at a great disadvantage and are concerned this locks us out of participating in the Canadian Market again.

We respectfully ask you to reconsider our request for an extension to the deadline. If we can have an additional 60 days this would allow us to fully complete the documentation. It seems that 60 days is not unreasonable, especially since it could be up to another 24-36 months before this can be addressed again.

We look forward to your response.

Regards,



Peter Rothwell, President | IGB Technologies Inc. | Suite 1120, 13 Mission Avenue, St. Albert, AB T8N 1H6
P: 780-456-3128 | C: 780-920-7787 | F: 780-456-3168 | E: prothwell@IGBTech.com | W: www.IGBTech.com

From: Fast, Laura [<mailto:Laura.Fast@cbsa-asfc.gc.ca>]

Sent: February 22, 2017 9:45 AM

To: Peter Rothwell <prothwell@igbtech.com>

Cc: leeig@iljin.co.kr; Kurt Cho (donghee.cho@iljin.co.kr) <donghee.cho@iljin.co.kr>; hyunhak.chung@iljin.co.kr; rachael.yeon@iljin.co.kr

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antidumping
Agence des services frontaliers du Canada / Gouvernement du Canada
Laura.Fast@cbsa-asfc.gc.ca Tél. : 613-954-1641

APPENDIX 3 (Public)

Iljin Electric Co., Ltd., “Power Transformer and Shunt Reactor”, Product Catalogue (March 2022)

Power Transformer and Shunt Reactor

Step Up Transformer

Step Down Transformer

Auto Transformer

Furnace Transformer

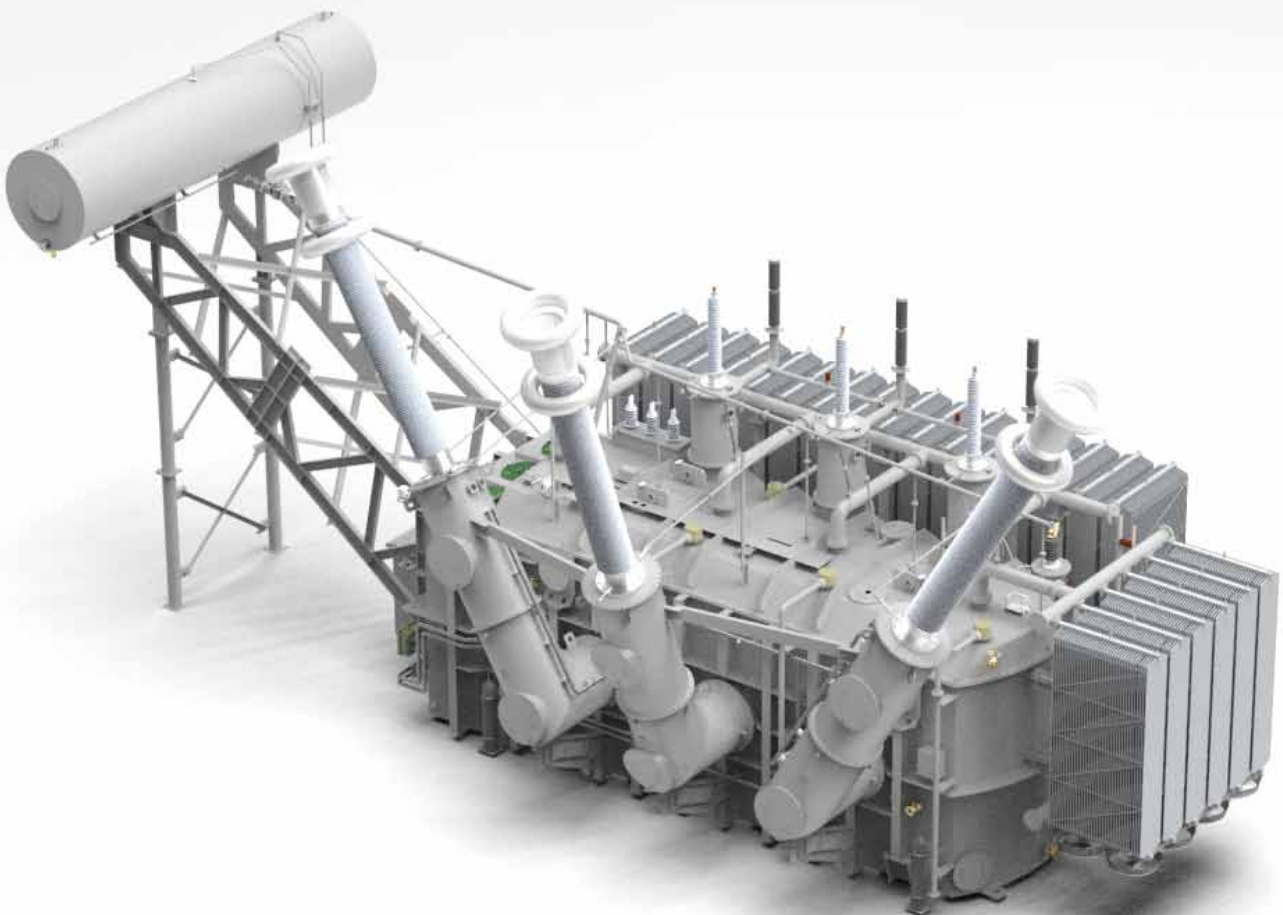
Scott Transformer

Less Flammable Power Transformer

Natural Ester Fluid Transformer

Gas Transformer

Shunt Reactor



ILJIN Electric is a global leader in the heavy electrical industry providing the best products and services with cutting edge technology of world class and competitiveness.



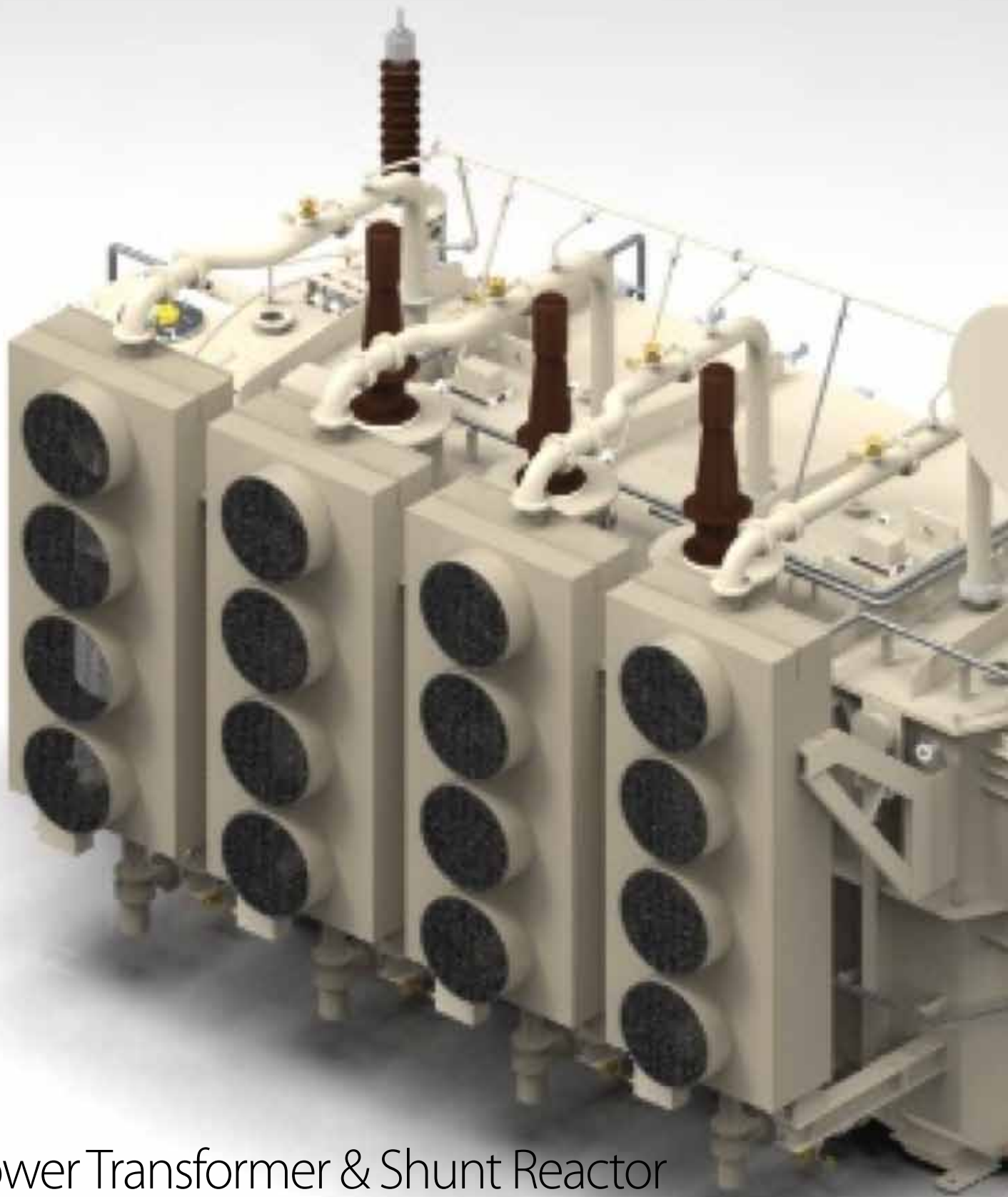


ILJIN Electric Co., Ltd., established in 1968 from ILJIN Metal industry Company, the parent company of ILJIN, is reborn as a global heavy electric specialist that supplies core equipment and services on power generation, transmission and transformation of electric power and distribution through continuous R&D and constant product innovation during the past four decades.

The Heavy Electric division that provides total solution for supplying stable power from power stations & large-sized plants to customer has been recognized globally through the successful execution of domestic and overseas turnkey projects. The Heavy Electric division is emerging as a global heavy electric total solutions company that leads the 21st century by setting customer satisfaction as its top priority.

Since starting its power business through the development of substation fittings for the first time domestically, the Heavy Electric division is developing and manufacturing core device of electric equipment such as EHV transformer, EHV GIS, IPB, Gas S/W, Recloser and C-GIS. Furthermore, the Heavy Electric division is expanding its power business area by providing IT Technology products, eco-friendly products and smart grid products.





Power Transformer & Shunt Reactor

ILJIN is a reliable business partner
in the power industry



Contents

| | |
|----|-------------------------------|
| 06 | Production Range |
| | · Transformer |
| | · Shunt Reactor |
| 09 | Transformer Design |
| 10 | Core |
| 12 | Winding |
| 14 | Core and Coil Assembly |
| 16 | Final Assembly |
| 18 | Testing |
| 19 | Quality Assurance |
| 20 | ILJIN'S Customer in the world |
| 22 | ILJIN Electric Global Network |

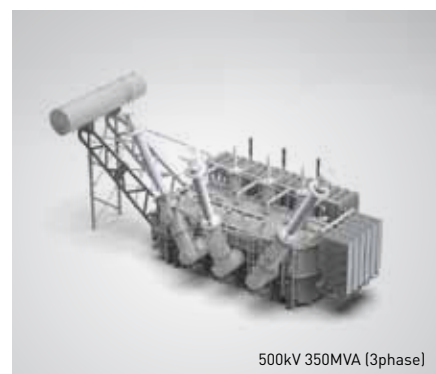
PRODUCT RANGE / OIL-IMMERSED TRANSFORMER DESIGN

Production Range

ILJIN transformer is becoming a world-class transformer manufacturer by meeting international standards such as IEC and ANSI, securing the ability to design, manufacture, and test in accordance with customer specifications in each country.

It supplies a variety of transformers that meet customer requirements and produces special transformers for various purposes such as single-phase or three-phase transformers, auto-transformer or multi-winding transformers, and shunt reactors.

| Phase / Rated Frequency | | Contents |
|-------------------------|-------------------------|--|
| Phase / Rated Frequency | | 1 or 3 Phase / 50 or 60 Hz |
| Insulation | | Oil Type |
| Rated Voltage | | Up to 765kV |
| Frame | Oil Preservation System | Conservator With Air Seal Cell Type N2 Sealed Type |
| | Cooling System | ONAN, ONAF, OFAN, OFAF, ODAF, OFWF, ODWF, KNAN, KANF, KFAF |
| | Base | Skid, Roller |
| Capacity | | Up to 1,000MVA |
| Application | | Substation, Generation Plant, Transmission & Distribution System, Electric Furnace, Scott Connection |
| Applied Standard | International Standard | IEC, ISO |
| | National Standard | KS, JEC, ANSI, BS, GOST, CSA |
| | Association Standard | KMC, ES, NEMA, TR2, ANSI (IEEE), JEMA |



Production Range

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| Phase / Rated Frequency | | Contents |
|-------------------------|------------------------|---|
| Phase / Rated Frequency | | 1 or 3 Phase / 60 Hz |
| Insulation | | SF ₆ Gas |
| Rated Voltage | | Up to 154kV |
| Frame | Cooling System | GDWF, GDAF |
| | Base | Skid, Roller |
| Capacity | | Up to 60MVA |
| Application | | Substations requiring fire safety (e.g. Urban substation, etc.) |
| Applied Standard | International Standard | IEC,ISO |
| | National Standard | KS,JEC,ANSI |
| | Association Standard | ES,NEMA, ANSI (IEEE) |

PRODUCT RANGE / SHUNT REACTOR DESIGN

Production Range

ILJIN shunt reactor is becoming a world-class transformer manufacturer by meeting international standards such as IEC and ANSI, securing the ability to design, manufacture, and test in accordance with customer specifications in each country.

It supplies a variety of transformers that meet customer requirements and produces special transformers for various purposes such as single-phase or three-phase transformers, auto-transformer or multi-winding transformers, and shunt reactors.

| Contents | | Descriptions |
|-------------------------|-------------------------|--|
| Phase / Rated Frequency | | 1 or 3 Phase / 50 or 60 Hz |
| Insulation | | Oil Type |
| Rated Voltage | | Up to 345kV |
| Frame | Oil Preservation System | ConservatorWith Air Seal Cell Type N2SealedType |
| | Cooling System | ONAN, ONAF, OFAN, OFAF, ODAF, OFWF, ODWF, KNAN, KANF, KFAF |
| | Base | Skid, Roller |
| Capacity | | Up to 200MVar |
| Tap Changer Type | | Fixed, Linear, Reversing, Coarse-Fine, De-energized |
| Application | | Networks with distributed generation (e.g. solar, wind power plants, etc.) Transmission system with long overhead lines or cables Substation with rapidly changing loadconsumption (e.g. metropolis, etc.) |
| Applied Standard | International Standard | IEC,ISO |
| | National Standard | KS,JEC,ANSI,BS,GOST,CSA |
| | Association Standard | KMC, ES,NEMA,TR2, ANSI (IEEE),JEMA |



345kV 100~200Mvar [3phase]



154kV 20Mvar [1phase]



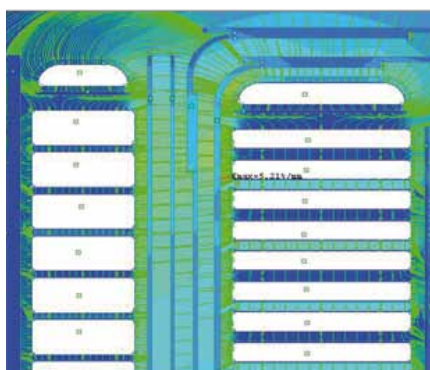
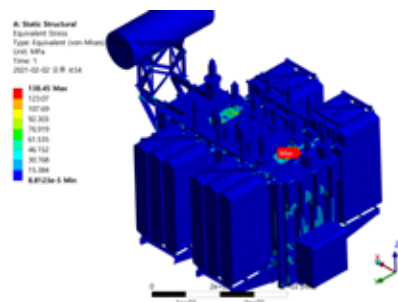
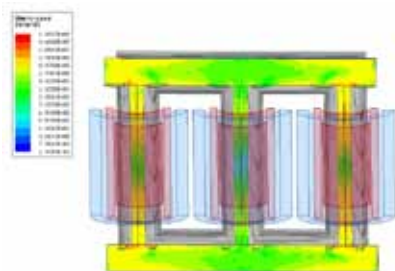
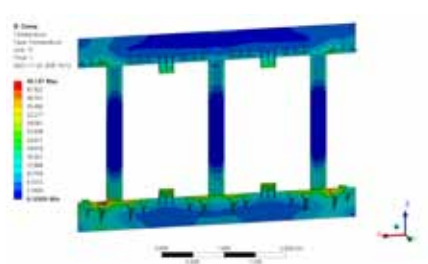
154kV 30~60Mvar [3phase]



33kV 45Mvar [3phase]

Transformer Design

With the applications of finite element analytic software and 3D computer aided drawing model's dynamic electromagnetic field, stress field, coupling heat flow for synchronized R&D and proof test. Through service test of computer aided analytic procedure including impedance calculation, coil short circuit/mechanical endurance, magnetic field and coil eddy current loss, it's possible to really know transformer's internal stress field and electromagnetic field effects.



Core

The standard core construction type of ILJIN transformer is core form type having three legs core or five legs core for three phases ; two legs core or three legs core for single phases; four legs core for Scott transformer according to the customer's requirement.

Cold Rolled Grain oriented silicon steel sheets with high permeability and low hysteresis loss are used in the construction of cores. They are thinly stratified to reduce eddy loss, and the joints are arranged with the form of step-lap types to reduce loss and noise



· AUTO CORE CUTTING MACHINE (CUT TO LENGTH)

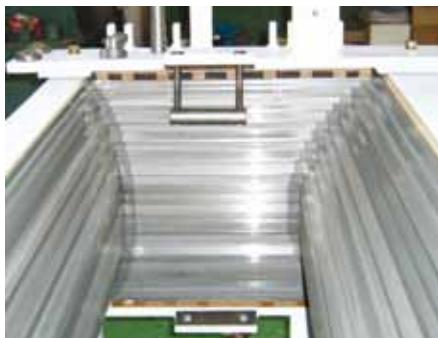


· CORE ASSEMBLY

ILJIN's Clamping method gives sturdy support and short-circuit strength to the windings by creating even pressure across the silicon steel sheets, keeping them firmly pressed together. This method helps to keep the core damage-free during transportation.



· CORE STACKING



· CORE BINDING



· ERECTION OF CORE ASSEMBLY

WINDING

Winding

ILJIN strictly takes care of moisture and dust, during the manufacture process. Especially, every engineer and other staff-members always have to enter the Air Shower Machine before they get in to the workshop for the winding process.

The winding is made by copper conductor covered with several layers of insulation paper and enamel coating of high dielectric strength. And the CTC(Continuously Transposed Conductor) is composed of several wires individually covered with enamel and this entire wire unit is covered with several layers of insulation paper.



· WINDING SHOP



Layer Winding



Interleaved Winding



Disc Winding



Helical Winding

· THE VARIETY OF WINDING

Layer, Interleaved, Disc, Helical Winding



· AIR SHOWER MACHINE

staff-members always have to enter the Air Shower Machine before they get in to the workshop for the winding process.



· HORIZONTAL WINDING MACHINE



· VERTICAL WINDING MACHINE

CORE AND COIL ASSEMBLY

Core and Coil Assembly

For insulation, all ILJIN transformers have a concentric winding structure. One or more insulating cylinders are placed around the core legs. The number of insulating cylinder depends on the voltage stress between the leg and the winding itself.

Vertical spacers are provided to produce an oil duct for the cooling of windings. Between the low and high voltage winding a number of insulating cylinders are provided at fixed distance from each other by using vertical spacers. The insulating cylinders are also placed between the phases.

After core and coil assembly is completed, it will be dried in the vapor phase drying plants under high vacuum condition for the purpose of eliminating moisture content.



· CORE AND COIL ASSEMBLY SHOP



· CORE AND COIL ASSEMBLY



· CORE AND COIL ASSEMBLY



· VAPOR PHASE DRYING PLANT

All of core and coil assembly should go through vapor phase drying process under vacuum condition to extract any moisture in core and coil.

FINAL ASSEMBLY

Final Assembly

Tanks have sufficient strength to withstand on internal pressure and full vacuum without damage and permanent deformation. In addition Tanks are designed to be endured ocean transportation, earthquake and un-expected bad weather. And we double check the cracks and other weak points of welding parts before painting through the non-destructive inspection.

After conducting the in-tanking work and assembling the exterior parts, vacuum and oil filtration are performed.



· IN-TANKING PROCESS



· IN-TANKING PROCESS



· TANK & MAGNETIC SHIELD

In order to reduce stray loss from leakage flux, we attach magnetic shields on the wall of tank.



· FINAL ASSEMBLY

TESTING

Testing

We possess reliable world-class testing and measuring equipment, and a system that provide our customers with products of the highest quality. Characteristic tests, insulation tests and temperature rise test that meet international standards such as IEC, ANSI, JEC and BS.

- 01) Ratio Test
- 02) Polarity & Phase Relation Test
- 03) Winding Resistance Measurement
- 04) Impedance Voltage & Load Losses
- 05) Excitation Current & No Load Losses
- 06) Temperature Rise
- 07) Lightning Impulse
- 08) Switching Impulse
- 09) Low Frequency And Partial Discharge Test
- 10) BCT Polarity Test
- 11) BCT Resistance Test
- 12) BCT Allowable Error Test
- 13) BCT Excitation Current Characteristic
- 14) BCT Power Frequency Test
- 15) BCT Insulation Resistance Test
- 16) OLTC Insulation Resistance Test
- 17) OLTC Control Circuit Applied Voltage Test
- 18) Dissolved Gas In Oil Analysis
- 19) Low Frequency Test On Auxiliary Devices And
Control And Current Transformer Circuits
- 20) Operation & Control Circuit Intensity Test
- 21) Audible Sound Level
- 22) Winding & Core Insulation Resistance
- 23) Insulation Power Factor & Capacitance
- 24) SFRA Test
- 25) Zero-Phase Sequence Impedance Voltage
- 26) DFRA Test



QUALITY ASSURANCE

Quality Assurance

ILJIN Electric promises trust in products and services provided based on continuous R&D and excellent quality competitiveness.

We are doing our best to obtain test certification according to international standards such as KERI and KEMA test certification to satisfy customer's detailed requirements, relevant standards, and national standards Including quality, environment, and safety and health certification systems.



TYPE TEST CERTIFICATION :

3 PHASE 50Hz 75/100/125MVA
220/72.5kV Power Transformer TESTED
BY KEMA HIGH-VOLTAGE LABORATORY, HOLLAND

COMPLETION OF TEST :

JANUARY 27, 2010



KS Q ISO 45001:2018 / ISO 45001:2018

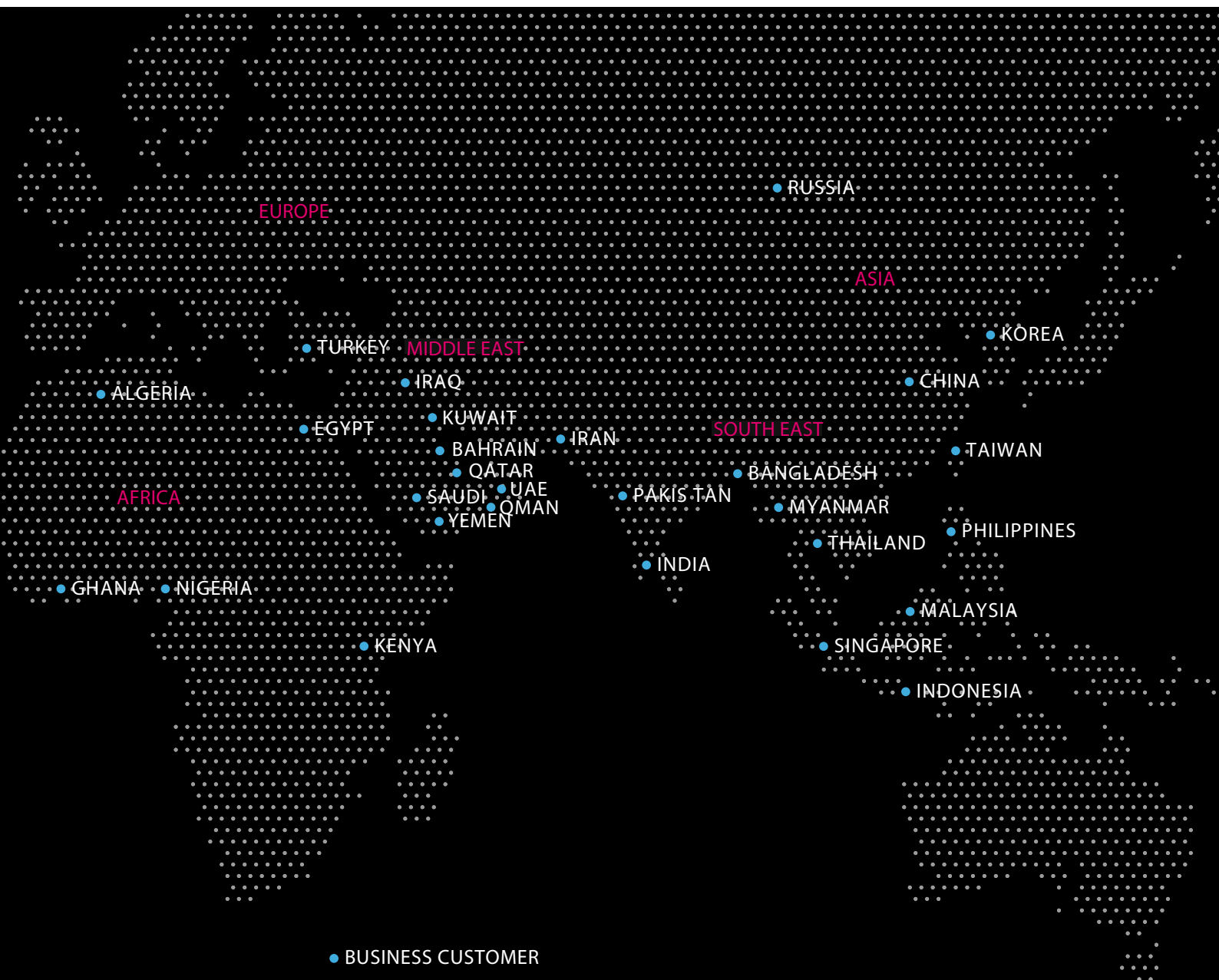


KS Q ISO 9001:2015 / ISO 9001:2015



KS I ISO 14001:2015 / ISO 14001:2015

ILJIN's Customer in the world



USA, 3 PHASE 500kV 350MVA



USA, 3 PHASE 345kV 448MVA



CANADA, 3 PHASE 138kV 42MVA



Tunisia, 3PHASE 225kV 200MVA



USA, 3 PHASE 69kV 150MVA



Australia, 3 PHASE 132kV 45MVA

ILJIN Electric Global Network

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Gyeonggi-do, 445-380, Korea
Tel) +82-31-220-0500

Hwaseong 2nd Plant (Power Cable)

905-64, Mannyeon-ro, Hwaseong-si,
Gyeonggi-do, 445-380, Korea
Tel) +82-31-220-0900

Hongseong Plant (Transformer & GIS)

467, Sandan-ro, Galsan-myeon, Hongseong-gun,
Chungnam-do, 350-852, Korea
Tel) +82-41-413-3000

Ansan Plant (SCR)

14 Block, 21, Neungan-ro, Danwon-gu, Ansan-si,
Gyeonggi-do, 425-100, Korea
Tel) +82-31-8085-7711



• Head Office



• Hwaseong 1st Plant



• Hwaseong 2nd Plant



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E-Mail) daniel.park@iljin.co.kr

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• Hongseong Plant



• Ansan Plant



• ILJIN Industry complex



Electric

ILJIN ELECTRIC CO., LTD. HEAVY ELECTRIC DIVISION

| | | |
|--------------------------------|--|---|
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| Hwaeseong Factory (H.Q) | 18365, 905-17, Mannyeon-ro, Hwaseong-si, Gyeonggi-do, Korea | I Tel : 82-31-220-0500 Fax : 82-41-631-9860 |
| Hongseong Factory | 32200, 99, Sandan-ro 388 beon-gil, Galsan-myeon, Hongseong-gun, Chungcheongnam-do | I Tel : 82-41-413-3252 Fax : 82-41-631-9860 |
| Website | www.iljinelectric.co.kr | |
| ILJIN Family | ILJIN Electric / ILJIN Diamond / ILJIN Materials / ILJIN Display / ILJIN Steel / ILJIN Unisco / ILJIN Hysolus / Alpinion Medical Systems | |

APPENDIX 4-A (Non-Confidential)

Confidential correspondence between ILJIN Electric Co., Ltd. and a Canadian customer

This appendix has been designated confidential in its entirety. It consists of confidential business correspondence between ILJIN Electric Co., Ltd. (ILJIN) and a customer in Canada. As such, it contains commercially sensitive confidential business information. We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN's customer in Canada if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this correspondence are not included in the non-confidential version of this appendix.

APPENDIX 4-B (Non-Confidential)

Project and Site Information

This appendix has been designated confidential in its entirety. It consists of commercially sensitive confidential business information and confidential proprietary information provided to ILJIN Electric Co., Ltd. (ILJIN). We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN's customer in Canada if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

APPENDIX 4-C (Non-Confidential)

On-Site Work RACI Chart

This appendix has been designated confidential in its entirety. It consists of commercially sensitive confidential business information and confidential proprietary information provided to ILJIN Electric Co., Ltd. (ILJIN). We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN's customer in Canada if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

APPENDIX 4-D (Non-Confidential)

Price Schedule

This appendix has been designated confidential in its entirety. It consists of commercially sensitive confidential business information concerning the proposed pricing of a power transformer by ILJIN Electric Co., Ltd. (ILJIN). We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN's customer in Canada if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

This Appendix is provided as a separate document in Excel format.

APPENDIX 4-E (Non-Confidential)

Technical Proposal and Initial Design

This appendix has been designated confidential in its entirety. It consists of commercially sensitive confidential business information and confidential proprietary information provided by ILJIN Electric Co., Ltd. (ILJIN) to a customer in Canada. We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN's customer in Canada if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

APPENDIX 4-F (Non-Confidential)

Technical Proposal

This appendix has been designated confidential in its entirety. It consists of commercially sensitive confidential business information and confidential proprietary information provided by ILJIN Electric Co., Ltd. (ILJIN) to a customer in Canada. We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN's customer in Canada if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

This Appendix is provided as a separate document in Excel format.

APPENDIX 5 (Non-Confidential)

Customer Purchase Order

This appendix has been designated confidential in its entirety. It consists of a purchase order that was issued by a customer in Canada concerning a power transformer to be manufactured by ILJIN Electric Co., Ltd. (ILJIN). It contains commercially sensitive confidential business information and confidential proprietary information. We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN's customer in Canada if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

APPENDIX 6 (Non-Confidential)

ILJIN Purchase Order

This appendix has been designated confidential in its entirety. It consists of a purchase order that was issued to ILJIN Electric Co., Ltd. (ILJIN) concerning a power transformer to be manufactured for delivery to a customer in Canada. It contains commercially sensitive confidential business information and confidential proprietary information. We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN's customer in Canada if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

APPENDIX 7 (Non-Confidential)

Price Trends of Raw Materials

This appendix has been designated confidential in its entirety. It contains commercially sensitive confidential business information and confidential proprietary information concerning the costs of certain raw materials (copper wire and grain-oriented silicon steel) that are used by ILJIN Electric Co., Ltd. (ILJIN) to manufacture power transformers. We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN, ILJIN's customers, and ILJIN's suppliers if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

This Appendix is provided as a separate document in Excel format.

APPENDIX 8 (Non-Confidential)

Summary of Domestic Sales of Large Power Transformers

This appendix has been designated confidential in its entirety. It contains commercially sensitive confidential business information and confidential proprietary information concerning sales of “large power transformers” by ILJIN Electric Co., Ltd. (ILJIN). We request that this information be treated as strictly confidential, as it would be detrimental to ILJIN and ILJIN’s customers if it were disclosed or otherwise made available to competitors and/or other stakeholders. As such, the contents of this document are not included in the non-confidential version of this appendix.

This Appendix is provided as a separate document in Excel format.