



October 27, 2025

SUBMITTED ELECTRONICALLY

Tristan Abbey
Administrator
U.S. Energy Information Administration
Department of Energy

RE: Agency Information Collection Proposed Extension [Docket No. 2025-16450]

Dear Mr. Abbey:

The Solar Energy Manufacturers for America (SEMA) Coalition appreciates the opportunity to comment on the Energy Information Administration's (EIA) notice of proposed extension and revisions to the Electric Power Surveys (EPS). As detailed in the following comments, SEMA is concerned with EIA's proposal to discontinue Form EIA-63B, Photovoltaic Module Shipments Report. This survey provides a needed official, government-collected dataset on U.S. solar module shipments by source and disposition and by state/territory. Importantly, the data collected regarding imports can be used by Customs and Border Protection (CBP) to enforce our trade and forced labor laws and by the Internal Revenue Service (IRS) to enforce the anti-China provisions in President Trump's One Big Beautiful Bill Act (OBBBA). Its discontinuation would create a significant gap in visibility at precisely the moment when tax and trade enforcement agencies, manufacturers, grid operators, and investors need more transparency, not less, in the solar supply chain.

The U.S. solar manufacturing sector is expanding at an unprecedented pace, with tens of billions in new investments and thousands of new jobs being created. But Chinese-owned actors in the solar supply chain have a track record of violating our trade laws and harming American manufacturing workers. Transparent, reliable, government-collected data is indispensable to defending against China's efforts to manipulate our energy markets by not paying tariffs, enforcing OBBBA restrictions, supporting domestic supply chains, and ensuring U.S. energy security. Discontinuing Form EIA-63B would undercut these national priorities. We stand ready to work with EIA to modernize the survey in a way that reduces burden while maintaining the critical transparency it provides.

The [SEMA Coalition](#) is a diverse group of solar manufacturers united to rebuild the domestic solar supply chain. We represent the interests of the major non-Chinese solar manufacturers who are building or looking to build strategic solar components across the value chain in the U.S. Our coalition advocates for a suite of policies to build a secure and competitive U.S. solar supply chain to meet our current and future energy demand while creating good-paying manufacturing jobs and protecting our national security.

We respectfully submit the enclosed comments in response to **Docket No. 2025-16450**, and welcome the opportunity to continue engaging with EIA and DOE on these important matters. For follow-up, please reach out to **yogin@semacoalition.org**.

Sincerely,

Mike Carr,
Executive Director
SEMA Coalition

Domestic Manufacturing and Energy Dominance

Over the past five years, the U.S. solar manufacturing industry has entered a period of rapid expansion. Dozens of new facilities have been announced or are under construction across the country, representing tens of billions of dollars in private investment and the creation of thousands of high-quality jobs. To accurately measure this growth, policymakers, investors, and analysts depend on consistent, government-verified data about domestic production and shipment trends.

Form EIA 63B provides one of the only transparent, public datasets tracking photovoltaic module shipments and production throughout the U.S. These data are essential to evaluate whether federal manufacturing tax incentives and policies, as modified by the OBBBA, are achieving their intended purpose of rebuilding domestic supply chains, eliminating tax credits to Chinese-owned entities, and reducing dependence on foreign imports. They also provide critical insight into how American manufacturing is contributing to the administration's broader energy dominance goals by supporting reliable domestic energy production and reducing exposure to foreign-controlled markets.

Discontinuing this data collection would obscure the nation's manufacturing progress and hinder evidence-based policymaking across key federal agencies, including DOE, Treasury, and Commerce. The onshoring of solar manufacturing jobs is a critical element of President Trump's manufacturing agenda and this data helps indicate this progress.

Powering the Growth of American Energy

The U.S. is entering a period of significant growth in energy demand, driven by broad economic expansion, industrial activity, and the emergence of new technologies such as artificial intelligence and advanced computing. Meeting this demand will require a reliable, affordable, and domestically produced energy supply that supports continued economic strength and national security.

Retaining Form EIA 63B directly supports President Trump's energy dominance agenda by providing the accurate government data needed to plan for sustained U.S. industrial growth. Shipment data on photovoltaic modules help policymakers, utilities, and manufacturers understand where domestic solar production is expanding, how quickly new generation capacity can be brought online, and how this growth contributes to the nation's broader energy portfolio.

Maintaining this dataset is needed to advance national goals to strengthen domestic production, secure critical supply chains, and ensure that rising power demand is met with U.S. made energy solutions. Eliminating it would deprive policymakers and industry of an analytical tool for aligning America's manufacturing strategy and power generation capacity with its long term energy dominance objectives.

Trade and Tax Enforcement and Market Monitoring

EIA's module shipment reports play a critical role in monitoring trade dynamics and ensuring a level playing field for domestic manufacturing workers. Public, standardized shipment

information allows policymakers and regulators to track import volumes, identify anomalies, and assess the effectiveness of U.S. trade remedies such as antidumping and countervailing duty measures, Section 201 safeguards, and enforcement under the Uyghur Forced Labor Prevention Act. For example, CBP is currently attempting to enforce the antistockpiling provisions in President Biden's misguided moratorium on duties from Chinese solar imports. Unlike Census trade data, this data includes shipments to specific localities that are useful to CBP. CBP needs this data to see where shipment went to evaluate stockpiling and properly collect duties.

Similarly, this data will support the IRS's enforcement efforts to ensure that solar projects using imports from prohibited foreign entities (Chinese-owned companies) do not receive federal tax credits. The IRS can compare taxpayer claims with records of domestic module manufacturing and shipments. Ending tax credits for projects that use all Chinese products is core to the OBBBA's energy tax title.

These data are also used by analysts, manufacturers, and agencies to evaluate where foreign-sourced products may be displacing domestic production and to identify vulnerabilities within the U.S. supply chain.

Without the EIA dataset, the federal government and private sector would lose a trusted, neutral benchmark for understanding market trends and supply chain risks. The absence of official module shipment data would leave CBP and the IRS dependent on proprietary or inconsistent third-party sources, reducing transparency, complicating enforcement, and weakening the ability of agencies to make timely and accurate trade and tax enforcement decisions.

At a time of growing global competition in clean energy manufacturing, maintaining a transparent and credible federal dataset is essential to protect domestic industry, uphold trade laws, and ensure that the benefits of U.S. production and investment are accurately reflected in federal analyses and decisions.

Conclusion

As the U.S. pursues energy dominance and scales domestic manufacturing to meet rising demand from AI, data centers, and the broader economy, transparent and reliable data are indispensable for maintaining competitiveness and ensuring sound energy planning. The U.S. solar manufacturing sector is rapidly evolving, and tax and trade enforcement agencies, investors, and grid planners need accurate information to understand how domestic production capacity is expanding and contributing to national energy security.

SEMA respectfully urges EIA to retain and modernize the Photovoltaic Module Shipments Report rather than discontinue it. We welcome the opportunity to work with EIA to streamline reporting requirements while preserving the integrity of this critical dataset that reflects the strength and progress of U.S. energy manufacturing.