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# Submission received electronically

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# Soumission reçu électroniquement

Submission Date /  
Date de soumission

**September 19, 2024**



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**Non-Confidential**

19 September 2024

SIMA Registry and Disclosure Unit  
c/o Hugo Dumas and Shawn Ryan  
Anti-dumping and Countervailing Program  
Canada Border Services Agency  
[SIMA Disclosure and Registry Unit@cbsa-asfc.gc.ca](mailto:SIMA_Disclosure_and_Registry_Unit@cbsa-asfc.gc.ca)

Dear Mr. Dumas and Mr. Ryan:

**Re: Large Liquid Dielectric Power Transformers – Comments on Request for Re-investigation made on behalf of Northern Transformer Corporation, PTI Transformers Inc., PTI Transformers L.P., and Transformatours Delta Star Inc.**

This correspondence is filed on behalf of ILJIN Electric Co., Ltd. (“ILJIN”) in response to the request for a re-investigation of normal values and export prices for exports of large power transformers by HD Hyundai Electric Co., Ltd. submitted by Northern Transformer Corporation, PTI Transformers Inc., PTI Transformers L.P., and Transformatours Delta Star Inc. (collectively, the “domestic producers”) on August 26, 2024.

On December 21, 2023, ILJIN filed a request for a normal value review or re-investigation with the Canada Border Services Agency (“CBSA”). For the reasons raised by ILJIN in that request (and subsequent correspondence), if the CBSA considers that it is appropriate to conduct a re-investigation to update normal values and export prices, ILJIN would appreciate the opportunity to fully participate and to be issued a determination.

The only re-investigation regarding large power transformers was conducted in 2017, more than 7 years ago. Further, as noted by the domestic producers in their request of August 26, 2024, the demand in the Canadian market is expected to be high in the near future, with at least 3,000 MVA in large power transformers procurements expected to be issued between October 2023 and March 2025. If a review is conducted, these circumstances support the initiation of a full re-investigation.

As always, if you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

**Tereposky & DeRose LLP**  
Stephanie Desjardins