



DEPARTMENT OF COMMERCE

International Trade Administration

[A-533-948]

Large Diameter Graphite Electrodes from India: Preliminary Affirmative Determination of Sales at Less-Than-Fair-Value, Preliminary Affirmative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures

AGENCY: Enforcement and Compliance, International Trade Administration, Department of Commerce.

SUMMARY: The U.S. Department of Commerce (Commerce) preliminarily determines that large diameter graphite electrodes (large graphite electrodes) from India are being, or are likely to be, sold in the United States at less-than-fair-value (LTFV). The period of investigation (POI) is January 1, 2025, through December 31, 2025. Interested parties are invited to comment on this preliminary determination.

DATES: Applicable [INSERT DATE OF PUBLICATION IN THE *FEDERAL REGISTER*].

FOR FURTHER INFORMATION CONTACT: Patrick Barton or Hannah Lee, AD/CVD Operations, Office VIII, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue, NW, Washington, DC 20230; telephone: (202) 482-0012 or (202) 482-1216, respectively.

SUPPLEMENTARY INFORMATION:

Background

This preliminary determination is made in accordance with section 733(b) of the Tariff Act of 1930, as amended (the Act). Commerce published the notice of initiation of this investigation on March 20, 2026.¹ On July 13, 2026, Commerce postponed the preliminary

¹ See *Large Diameter Graphite Electrodes from the People's Republic of China and India: Initiation of Less-Than-Fair-Value Investigations*, 91 FR 13581 (March 20, 2026) (*Initiation Notice*).

determination of this investigation; the revised deadline is now September 22, 2026.²

For a complete description of the events that followed the initiation of this investigation, *see* the Preliminary Decision Memorandum.³ A list of topics included in the Preliminary Decision Memorandum is included as Appendix II to this notice. The Preliminary Decision Memorandum is a public document and is on file electronically via Enforcement and Compliance's Antidumping and Countervailing Duty Centralized Electronic Service System (ACCESS). ACCESS is available to registered users at <https://access.trade.gov>. In addition, a complete version of the Preliminary Decision Memorandum can be accessed directly at <https://access.trade.gov/frnotices>.

Scope of the Investigation

The products covered by this investigation are large diameter graphite electrodes from India. For a complete description of the scope of this investigation, *see* Appendix I.

Scope Comments

In accordance with the *Preamble* to Commerce's regulations,⁴ the *Initiation Notice* set aside a period of time for parties to raise issues regarding product coverage (*i.e.*, scope).⁵ Certain interested parties commented on the scope of the investigation as it appeared in the *Initiation Notice*. For a summary of the product coverage comments and rebuttal comments submitted to the record for this preliminary determination, and accompanying discussion and analysis of all comments timely received, *see* the Preliminary Scope Decision Memorandum.⁶ Commerce is preliminarily modifying the scope language as it appeared in the *Initiation Notice*. *See* the revised scope in Appendix I to this notice.

² *See Large Diameter Graphite Electrodes from India: Postponement of Preliminary Determination in the Less-Than-Fair-Value Investigation*, 91 FR 42931 (July 13, 2026).

³ *See* Memorandum, "Decision Memorandum for the Preliminary Determination in the Less-Than-Fair-Value and Preliminary Affirmative Determination of Critical Circumstances in the Investigation of Large Diameter Graphite Electrodes from India," dated concurrently with, and hereby adopted by, this notice (Preliminary Decision Memorandum).

⁴ *See Antidumping Duties; Countervailing Duties, Final Rule*, 62 FR 27296, 27323 (May 19, 1997).

⁵ *See Initiation Notice*, 91 FR at 13581-82.

⁶ *See* Memorandum, "Less-Than-Fair-Value and Countervailing Duty Investigations of Large Diameter Graphite Electrodes from India and the People's Republic of China: Preliminary Scope Decision Memorandum," dated July 24, 2026 (Preliminary Scope Decision Memorandum).

Methodology

Commerce is conducting this investigation in accordance with section 731 of the Act. Commerce has calculated export prices in accordance with section 772(a) of the Act, and constructed export prices in accordance with section 772(b) of the Act. Normal value is calculated in accordance with section 773 of the Act. For a full description of the methodology underlying the preliminary determination, *see* the Preliminary Decision Memorandum.

Preliminary Affirmative Determination of Critical Circumstances

In accordance with section 733(e) of the Act and 19 CFR 351.206, Commerce preliminarily finds that critical circumstances exist for Graphite India Limited (GIL), HEG Limited (HEG), and all other producers and exporters of the subject merchandise. For a full description of the methodology and results of Commerce's critical circumstances analysis, *see* the Preliminary Decision Memorandum.

All-Others Rate

Sections 733(d)(1)(ii) and 735(c)(5)(A) of the Act provide that, in the preliminary determination, Commerce shall determine an estimated weighted-average dumping margin, *i.e.*, the all-others rate, for all exporters and producers not individually examined. This rate shall be an amount equal to the weighted average of the estimated weighted-average dumping margins established for exporters and producers individually investigated, excluding any zero and *de minimis* margins, and any margins determined entirely under section 776 of the Act.

In this investigation, Commerce calculated estimated weighted-average dumping margins for GIL and HEG that are not zero, *de minimis*, or based entirely on facts otherwise available. Commerce calculated the all-others rate using a weighted average of the estimated weighted-average dumping margins calculated for the examined respondents using each company's publicly-ranged values for the merchandise under consideration.⁷

⁷ With two respondents under examination, Commerce normally calculates: (A) a weighted-average of the estimated weighted-average dumping margins calculated for the examined respondents; (B) a simple average of the

Preliminary Determination

Commerce preliminarily determines that the following estimated weighted-average dumping margins exist:

Exporter/Producer	Weighted-Average Dumping Margin (percent)	Cash Deposit Rate (Adjusted for Subsidy Offset(s)) (percent)
Graphite India Limited	12.22	9.88
HEG Limited	4.97	1.15
All Others	6.95	3.53 ⁸

Suspension of Liquidation

Section 733(e)(2) of the Act provides that, given an affirmative determination of critical circumstances, any suspension of liquidation shall apply to unliquidated entries of subject merchandise entered, or withdrawn from warehouse, for consumption on or after the later of: (a) the date which is 90 days before the date on which the suspension of liquidation was first ordered; or (b) the date on which notice of initiation of the investigation was published.

Commerce preliminarily finds that critical circumstances exist for imports of subject merchandise produced or exported by GIL, HEG, and all other producers/exporters of the subject merchandise. In accordance with section 733(e)(2)(A) of the Act, the suspension of liquidation shall apply to unliquidated entries of shipments of subject merchandise from the producers or exporters identified in this paragraph that were entered, or withdrawn from warehouse, for consumption on or after the date which is 90 days before the publication of this notice.

estimated weighted-average dumping margins calculated for the examined respondents; and (C) a weighted-average of the estimated weighted-average dumping margins calculated for the examined respondents using each company's publicly-ranged U.S. sales values for the merchandise under consideration. Commerce then compares (B) and (C) to (A) and selects the rate closest to (A) as the most appropriate rate for all other producers and exporters. *See, e.g., Ball Bearings and Parts Thereof from France, Germany, Italy, Japan, and the United Kingdom: Final Results of Antidumping Duty Administrative Reviews, Final Results of Changed-Circumstances Review, and Revocation of an Order in Part*, 75 FR 53661, 53662 (September 1, 2010), and accompanying Issues and Decision Memorandum at Comment 1. As complete publicly ranged sales data were available, Commerce based the all-others rate on the publicly ranged sales data of the mandatory respondents. For a complete analysis of the data, *see* Memorandum, "Preliminary Determination All-Others Rate Calculations," dated concurrently with this notice (All-Others Rate Calculation Memorandum).

⁸ *See* Memorandum, "Preliminary Calculation of Export Subsidy Offsets," dated concurrently with this notice.

Further, pursuant to section 733(d)(1)(B) of the Act and 19 CFR 351.205(d), Commerce will instruct CBP to require a cash deposit equal to the estimated weighted-average dumping margin or the estimated all-others rate, as follows: (1) The cash deposit rate for the respondents listed above will be equal to the company-specific estimated weighted-average dumping margins determined in this preliminary determination; (2) if the exporter is not a respondent identified above, but the producer is, then the cash deposit rate will be equal to the company-specific estimated weighted-average dumping margin established for that producer of the subject merchandise; and (3) the cash deposit rate for all other producers and exporters will be equal to the all-others estimated weighted-average dumping margin.

Commerce normally adjusts cash deposits for estimated antidumping duties by the amount of export subsidies countervailed in a companion countervailing duty (CVD) proceeding, when CVD provisional measures are in effect. Accordingly, where Commerce preliminarily made an affirmative determination for countervailable export subsidies, Commerce has offset the estimated weighted-average dumping margin by the appropriate CVD rate.⁹ Any such adjusted cash deposit rate may be found in the “Preliminary Determination” section above.

Should provisional measures in the companion CVD investigation expire prior to the expiration of provisional measures in this LTFV investigation, Commerce will direct CBP to begin collecting estimated antidumping duty cash deposits unadjusted for countervailed export subsidies at the time that the provisional CVD measures expire.

These suspension of liquidation instructions will remain in effect until further notice.

Disclosure

Commerce intends to disclose its calculations and analysis performed to interested parties in this preliminary determination within five days of any public announcement or, if there is no

⁹ See *Large Diameter Graphite Electrodes from India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination with Final Antidumping Duty Determination*, 91 FR 48081 (July 30, 2026), and accompanying Preliminary Decision Memorandum.

public announcement, within five days of the date of publication of this notice in accordance with 19 CFR 351.224(b).

Consistent with 19 CFR 351.224(e), Commerce will analyze and, if appropriate, correct any timely allegations of significant ministerial errors by amending the preliminary determination. However, consistent with 19 CFR 351.224(d), Commerce will not consider incomplete allegations that do not address the significance standard under 19 CFR 351.224(g) following the preliminary determination. Instead, Commerce will address such allegations in the final determination together with issues raised in the case briefs or other written comments.

Verification

As provided in section 782(i)(1) of the Act, Commerce intends to verify the information relied upon in making its final determination.

Public Comment

Case briefs or other written comments may be submitted to the Assistant Secretary for Enforcement and Compliance no later than seven days after the date on which the last verification report is issued in this investigation, unless the Secretary alters the time limit. A timeline for the submission of case briefs and written comments will be notified to interested parties at a later date. Rebuttal briefs, limited to issues raised in the case briefs, may be filed not later than five days after the date for filing case briefs.¹⁰ Interested parties who submit case briefs or rebuttal briefs in this proceeding must submit: (1) a table of contents listing each issue; and (2) a table of authorities.¹¹

As provided under 19 CFR 351.309(c)(2)(iii) and (d)(2)(iii), we request that interested parties provide at the beginning of their briefs a public, executive summary for each issue raised in their briefs.¹² Further, we request that interested parties limit their executive summary of each

¹⁰ See 19 CFR 351.309(d); see also *Administrative Protective Order, Service, and Other Procedures in Antidumping and Countervailing Duty Proceedings*, 88 FR 67069, 67077 (September 29, 2023) (*APO and Service Procedures*).

¹¹ See 19 CFR 351.309(c)(2) and (d)(2).

¹² We use the term “issue” here to describe an argument that Commerce would normally address in a comment of the Issues and Decision Memorandum.

issue to no more than 450 words, not including citations. We intend to use the executive summaries as the basis of the comment summaries included in the issues and decision memorandum that will accompany the final determination in this investigation. We request that interested parties include footnotes for relevant citations in the executive summary of each issue. Note that Commerce has amended certain of its requirements pertaining to the service of documents in 19 CFR 351.303(f).¹³

Pursuant to 19 CFR 351.310(c), interested parties who wish to request a hearing, limited to issues raised in the case and rebuttal briefs, must submit a written request to the Assistant Secretary for Enforcement and Compliance, U.S. Department of Commerce, within 30 days after the date of publication of this notice. Requests should contain the party's name, address, and telephone number, the number of participants, whether any participant is a foreign national, and a list of the issues to be discussed. If a request for a hearing is made, Commerce intends to hold the hearing at a time and date to be determined. Parties should confirm by telephone the date, time, and location of the hearing two days before the scheduled date.

Postponement of Final Determination and Extension of Provisional Measures

Section 735(a)(2) of the Act provides that a final determination may be postponed until not later than 135 days after the date of the publication of the preliminary determination if, in the event of an affirmative preliminary determination, a request for such postponement is made by exporters who account for a significant proportion of exports of the subject merchandise, or in the event of a negative preliminary determination, a request for such postponement is made by the petitioner. Section 351.210(e)(2) of Commerce's regulations requires that a request by exporters for postponement of the final determination be accompanied by a request for extension of provisional measures from a four-month period to a period not more than six months in duration.

On September 8 and 15, 2026, respectively, pursuant to 19 CFR 351.210(e), Resonac

¹³ See *APO and Service Procedures*.

Graphite America Inc. and Tokai Carbon GE LLC (the petitioners) and HEG requested that Commerce postpone the final determination and that provisional measures be extended to a period not to exceed six months.¹⁴ In accordance with section 735(a)(2)(A) of the Act and 19 CFR 351.210(b)(2)(ii), because: (1) the preliminary determination is affirmative; (2) the requesting exporters accounts for a significant proportion of exports of the subject merchandise; and (3) no compelling reasons for denial exist, Commerce is postponing the final determination and extending the provisional measures from a four-month period to a period not greater than six months. Accordingly, Commerce will make its final determination no later than 135 days after the date of publication of this preliminary determination.

U.S. International Trade Commission Notification

In accordance with section 733(f) of the Act, Commerce will notify the U.S. International Trade Commission (ITC) of its preliminary determination. If the final determination is affirmative, the ITC will determine before the later of 120 days after the date of this preliminary determination or 45 days after the final determination whether these imports are materially injuring, or threaten material injury to, the U.S. industry.

Notification to Interested Parties

This determination is issued and published in accordance with sections 733(f) and 777(i)(1) of the Act and 19 CFR 351.205(c).

Dated: September 22, 2026.

Scot Fullerton,
Acting Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations.

¹⁴ See Petitioners' Letter, "Petitioners' Request to Postpone the Final Determination," dated September 8, 2026; *see also* HEG's Letter, "Request to Postpone the Deadline for Final Determination," dated September 15, 2026.

Appendix I

Scope of the Investigation

The merchandise covered by the investigation includes all large diameter graphite electrodes of any length, whether or not finished, of a kind used in furnaces, with a nominal or actual diameter exceeding 425 millimeters (16.7 inches), and whether or not attached to a graphite pin joining system or any other type of joining system or hardware. The merchandise covered by the investigation also includes graphite pin joining systems (commonly referred to as pins or nipples) for large diameter graphite electrodes, of any length, and with a minimum diameter of 228.6 mm (9 inches) at its widest transverse cross-section, whether or not finished, of a kind used in furnaces, and whether or not the graphite pin joining system is attached to, sold with, or sold separately from, the large diameter graphite electrode. Unfinished large diameter graphite electrodes are graphitized electrodes that have not undergone final machining. For purposes of the investigation, the country of origin is determined by the country of graphitization.

Excluded from the scope of the investigation are large diameter graphite electrodes that are subject to the existing antidumping duty order on Small Diameter Graphite Electrodes from the People's Republic of China. *See Antidumping Duty Order: Small Diameter Graphite Electrodes from the People's Republic of China*, 74 FR 8775 (February 26, 2009) (*SDGE China AD Order*) due to an affirmative determination of circumvention that imports of graphite electrodes from the People's Republic of China, produced and/or exported by Sinosteel Jilin Carbon Co., Ltd. and Jilin Carbon Import & Export Company (collectively, Jilin Carbon), with an actual or nominal diameter of 17 inches and otherwise meeting the description of the scope of the *SDGE China AD Order* constitute merchandise subject to the *SDGE China AD Order*. *See Small Diameter Graphite Electrodes from the People's Republic of China: Affirmative Final Determination of Circumvention of the Antidumping Duty Order and Rescission of Later-Developed Merchandise Anticircumvention Inquiry*, 78 FR 56864 (September 16, 2013). In the case of graphite electrodes entering the United States determined to be subject to the *SDGE China AD Order*, such order controls. In the case of graphite electrodes entering the United States meeting the scope definition of the investigation and not covered by the scope of the *SDGE China AD Order*, the scope of the investigation controls.

Large diameter graphite electrodes and graphite pin joining systems for large diameter graphite electrodes that are covered by the investigation are currently classified under the Harmonized Tariff Schedule of the United States (HTSUS) statistical reporting number 8545.11.0020. Merchandise covered by the investigation may also enter under HTSUS statistical reporting numbers 3801.10.5090 or 3801.90.0050. The HTSUS numbers are provided for convenience and customs purposes, but the written description of the scope is dispositive.

Excluded from the scope of the investigation are certain thermal energy storage (TES) graphite blocks. The excluded TES graphite blocks are machine-milled, non-cylindrical graphite blocks, which have: a coefficient of thermal expansion of 1.5 $\mu\text{m}/(\text{m}\cdot\text{K})$ or greater, and an apparent (also known as bulk) density below 1.74 g/cm³, and which have an actual length of between 228.6 mm (9.0 inches) and 3010 mm (118.5 inches), an actual width between 228.6 mm (9.0 inches) and 560 mm (22.0 inches), an actual height between 228.6 mm (9.0 inches) and 560 mm (22.0 inches), and which have been machined to include two or more holes of at least 150 mm (5.9 inches) in depth and at least 35 mm (1.4 inches) in diameter.

The two or more 150 mm deep holes must be located: (i) along the longest centerline of the longest side of the block, each located on the same side of the block, (ii) spaced at intervals of no greater than 1000 mm (39.4 inches) apart as measured from the outer edge of the holes, and (iii)

with the hole closest to each end of the longest centerline located within 1000 mm of the corresponding end of the block. Blocks may contain any number of additional holes, channels, or grooves in any configuration or location, provided that at least two or more holes of at least 150 mm depth are present as described above.

Further excluded from the scope of the investigation are certain TES graphite blocks, anchors, and pins, regardless of shape, which have a coefficient of thermal expansion of $1.5 \mu\text{m}/(\text{m}\cdot\text{K})$ or greater, and an apparent (also known as bulk) density below 1.74 g/cm^3 , with actual dimensions such that any one or more of the length, width, or height is less than 228.6 mm (9.0 inches).

Appendix II

List of Topics Discussed in the Preliminary Decision Memorandum

- I. Summary
- II. Background
- III. Period of Investigation
- IV. Discussion of the Methodology
- V. Preliminary Affirmative Determination of Critical Circumstances
- VI. Currency Conversion
- VII. Adjustments to Cash Deposit Rates for Export Subsidies in the Companion
Countervailing Duty Investigation
- VIII. Recommendation

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