

Response to request for review for Project 0736: 7.5 MW Grid Connected Biomass Power Project

Comment No.1:

As per the registered monitoring plan, data of electricity generation and auxiliary consumption should be monitored through DCS. However, the verification report stated in Clarification Request (CL) 6 that “due to technical problems, online readings were not taken but manual reading of all parameters were recorded as required”. Although this data is not used in the calculation of CERs, the DOE is required to provide further explanation regarding the nature and duration of these technical problems and how these problems have been addressed by the project participant to ensure that the requirement in the monitoring plan will be met.

Response by project proponent:

The electricity generation and auxiliary consumption are measured by Tri Vector Energy Meters and the data are monitoring by both manual and DCS. Due to some technical problem in the DCS System, the online readings were not taken but manual reading of all parameters were recorded as required. The technical problem in the DCS System was rectified and connected with meters in January 2007.

Response by TÜV SÜD:

A clarification request (CR 6) was raised to address this issue at the verification stage itself. In response to this the manual recording procedure was submitted to the DOE. This was found to be adequate to record the electricity generation and auxiliary consumption by the project activity. Also these monitoring data are not used in the emission reduction calculations, which are based on export and import monitored at the grid sub-station. Hence in our opinion, the uncertainty in emission reduction calculation by adopting manual recording procedure does not exist. Further, we would like to like confirm that 100% data for electricity generation and auxiliary consumption has been recorded through manual recording and there is no loss of data in absence of DCS system.

The forward action request 1 (FAR 1) concerning the same has been modified in the revised verification report (enclosed). The project proponent has clarified that the problem existed for the entire monitoring period (22.03.2006 to 31.12.2006) because energy meters supplied along with the panel by the vendors were having RS 485 communication protocol whereas the DCS was having RS 232 communication protocol. Due to this project proponent was not able to link the meters with DCS. The problem has already been rectified during the annual maintenance shut down in January.

Comment No.2:

Due to it being a small scale CDM project, its PDD was completed by using the template of SSC CDM PDD, ver. 02 correctly, but at the page head, “CDM PDD ver. 02” was misstated throughout the all pages of the PDD.

Response by TÜV SÜD:

Yes, the header in the registered PDD is misstated as “CDM PDD ver. 02” in place of “SSC CDM PDD, ver. 02”. The PDD has been registered as it is at the moment and there are no



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procedures to revise the PDD during verification process and there is no necessity to do it as this does not affect the emission reductions.

Comment No.3:

In the PDD, Section B.4. "Description of how the definition of the project boundary related to the baseline methodology selected is applied to the project activity", it was misstated that ".....Transport of the biomass, the electricity generation and the electricity grid are not included in the project boundary". However, for the biomass power project, the major fuel is the biomass residue to be transported from the source site, and output is electricity generation which is delivered to the connected electricity grid. All of them are attributable to the project activity and are measurable and under control by the PP, and therefore should be included in the project boundary, although the CO₂ emissions from transport of the biomass are not calculated in the project emissions, according to the AMS-I.D. In addition, the coal consumption and the relevant handling equipment are missing in the flow chart of the project and its boundaries.

Response by TÜV SÜD:

Yes, the description of the project boundary is misstated in the registered PDD. However, the electricity generation, the electricity grid and coal consumption are included in the monitoring plan of the registered PDD, which is inline with applied methodology AMS I.D version 9. The PDD has been registered as it is at the moment and there are no procedures to revise the PDD during verification process and there is no necessity to do it as this does not affect the emission reductions.

Please note that inline with guidance provided by CDM EB in paragraph 84 of its 33rd meeting report, following statement was already added in the verification report (page no. 1) submitted during requesting issuance:

"The verifier confirms that monitoring plan of project activity is in accordance with applied methodology AMS I.D, version 9.

Comment No.4:

In the PDD there is no definition regarding what is called "Net CO₂ baseline emission factor" and "Net project emissions" Here "Net" should be deleted.

Response by TÜV SÜD:

Yes, the word 'net' has been misstated in the registered PDD. However, the grid emission factor has been fixed ex-ante and coal has been monitored as per the monitoring plan in the registered PDD and applied methodology AMS I.D version 9. These data have been appropriately used to calculate the baseline and project emissions as required by applied methodology AMS I.D version 9. The PDD has been registered as it is at the moment and there are no procedures to revise the PDD during verification process and there is no necessity to do it as this does not affect the emission reductions.

Comment No.5:

In the Table of the PDD, Section E2, page 34, the item "Net CO₂ baseline emission (in kg CO₂/kWh) there is a typewriting error, which should be "CO₂ baseline emission factor (in kg CO₂/kWh)".



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Response by TÜV SÜD:

Yes, this is a typewriting error in the registered PDD. The PDD has been registered as it is at the moment and there are no procedures to revise the PDD during verification process and there is no necessity to do it as this does not affect the emission reductions.

Comment No.6:

Net project emissions = $53,217 * 0.85$ tons CO₂/yr should be baseline emissions, while project emissions should be =21,469 tons CO₂ (assuming 25% fuel used is coal).

Response by TÜV SÜD:

Yes, this is again a typewriting error in the registered PDD. However, the terminology has been correctly used in the monitoring report submitted during requesting issuance. The PDD has been registered as it is at the moment and there are no procedures to revise the PDD during verification process and there is no necessity to do it as this does not affect the emission reductions.

Summary of response by TÜV SÜD:

We agree that there were some misstatements in registered PDD, however, the monitoring plan of the registered PDD was found to be inline with the applied methodology AMS I.D, version 9. Also, the calculations for baseline emissions, project emissions and emission reductions in the final monitoring report submitted during request for issuance were done in line with the applied methodology.