



UNFCCC Secretariat
 Martin-Luther-King-Strasse 8
 D-53153 Bonn
 Germany

DET NORSKE VERITAS
 CERTIFICATION AS
 International Climate Change Services
 Veritasveien 1
 NO-1322 Høvik
 Norway
 Tel: +47-6757 9900
 Fax: +47-6757 9911
 http://www.dnv.com
 NO 945 748 931 MVA

Your ref.:

Our ref.:
 MLEH

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Validation opinion

Request for revision of monitoring plan for project activity 0463 entitled “AWMS GHG Mitigation Project MX06-B-32, Aguascalientes and Guanajuato, México”

We refer to the procedure for revising monitoring plans adopted at EB 26. We herewith request a revision of the monitoring plan for project activity 0463 entitled “AWMS GHG Mitigation Project MX06-B-32, Aguascalientes and Guanajuato, México”.

The revision is related to the monitoring of the electricity use of project equipment which is used to determine leakage. The monitoring plan of the project states that electricity consumed by project activity equipment should be measured (m). The project participants initially compared the farm’s monthly power bills to determine leakage. However, it became clear that an accurate determination of the power consumed by the individual equipment could not be discerned using this method and was not, therefore, a reliable means for determining equipment leakage. Further, it was considered impractical to install individual watt-hour meters in-line with each motor when the average leakage was a mere ton or two CO₂e per farm site.

The objective of the proposed revision is to also allow the calculation of the electricity use, in addition to measuring the electricity use. If the electricity consumed is calculated, one shall assume that all relevant electrical equipment operates at full rated capacity, plus 10% to account for distribution losses, for 8760 hours per annum.

This alternative approach to determine the electricity use of project was approved by the CDM Executive Board for similar projects developed by the same project participants.

(a) the proposed revision of the monitoring plan ensures that the level of accuracy or completeness in the monitoring and verification process is not reduced as a result of the revisions

It appears that leakage determined using calculations, as specified in the revised monitoring plan, is more conservative than if watt-meters were installed in-line with project activity equipment.

(b) the proposed revision of the monitoring plan is in accordance with the approved monitoring methodology applicable to the project activity

The approved monitoring methodology AM0016 does not allow for the calculation of electricity consumption. However, the calculation of the electricity consumption has been approved by the CDM Executive Board for similar projects through approving requests for deviations / requests to apply approved requests for deviations.

(c) the findings of previous verification reports, if any, have been taken into account

DNV's verification activity for the project revealed that measuring of the electricity use of the project equipment is not feasible and that calculating the electricity use is conservative when applying the assumptions stipulated and approved by the CDM Executive Board for calculating electricity use.

Yours faithfully
for DET NORSKE VERITAS CERTIFICATION AS



Michael Lehmann
Technical Director
International Climate Change Services

Annex I

Excerpt of Monitoring Plan Related to Project Activity Leakage

D.2.3 Treatment of leakage in the monitoring plan:**D.2.3.1 If applicable, please describe the data and information that will be collected in order to monitor leakage effects of the project activity:**

ID number	Data variable	Source of data	Data unit	Measured (m), calculated (c) or estimated (e)	Recording frequency	Proportion of data to be monitored	How will the data be archived? (electronic/paper)	Comment
16. EP _y	Electricity	Power	kWh	m or c	Monthly	100%	electronic	Electricity used for project equipment. If calculated, assume that all relevant electrical equipment operates at full rated capacity, plus 10% to account for distribution losses, for 8760 hours per annum.
19. EP _p	Electricity	Power	kWh	m	Monthly	100%	electronic	Electricity produced through co generation of the captured methane