

TABLE FOR COMMENTS

Name of submitter: Mr. Basak, Sujoy Coomar

Affiliated organization of the submitter (if any): L&T Power Development Limited

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0	1	2	3	4	5	6
#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
1	Baseline Methodology Procedure, Step 1, para 1 Page 3/25	1,2,3	te	<p><i>Identify all power plants (excluding power plants registered as CDM project activities but including power plants requesting registration as CDM project activities or under validation)</i></p> <p><u>Justification:</u> Baseline should be defined as project activity without consideration of CDM benefits. Projects under validation should be excluded from at this stage along with registered projects, in line with Step 2, para 47 of "Tool for the assessment and demonstration of additionality" (Version 06.0.0)</p>	<p><i>Identify all power plants (excluding power plants registered or requesting registration or undergoing validation as CDM project activities)</i></p>	

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2	Baseline Methodology Procedure, Step 1, last paragraph Page 3/25	1,2,3,4,5	ge	<p><i>The CDM PDD should have a table with the following information: name of the unit, operator of the unit, exact location of the unit, power generation technology used, planned installed capacity of the unit, the year when government permit was issued and whether the request for tender was made available to suppliers for acquiring major equipment or whether the contracts for equipment or construction/ operation services were signed</i></p> <p><b>Guidance Sought:</b> The information requested on year of issue of government permit may not be publicly available, nor is it published by any Government agency.</p>	Guidance requested from the Meth Panel	
3	Baseline Methodology Procedure, Step 3, para 2 Page 4/25	1,2	te	<p><i>Add up the market shares of each technology one by one from the end of the least efficient technology until the subtotal of market shares reaches 80% in terms of installed generation capacity</i></p> <p><b>Justification:</b> Several webhosted projects reveal that subcritical plants generally have capacities less than 600 MW, supercritical/ultra-supercritical plants have capacities of 600-1000 MW. This will cause the market share based on installed capacity to appear biased towards higher efficiency. It is suggested that market share may be computed based on number of plants being implemented rather than on their planned capacity</p>	<i>Add up the market shares of each technology one by one from the end of the least efficient technology until the subtotal of market shares reaches 80% in terms of number of planned plants</i>	
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4	Baseline Methodology Procedure, last para Page 15/25	6,7,8,9	te	<p><i>if such information is not available, the DOE may check against government publications provided that the data are collected and verified by a governmental organization and they are based on the actual fuel consumption and electricity generation of the plants and not derived from other data (e.g. regulations)</i></p> <p><b>Justification:</b> It is unclear as to how the DOE or PP will be able to comment whether the government publication is verified. The information note on ACM0013, published in the 53<sup>rd</sup> meeting of the Meth Panel, clearly distinguishes CEA as the data source being used by most Indian project activities. Considering the emission factor of grid is being calculated by CEA for use in Indian CDM projects, does the Meth Panel consider this data to be appropriate in line with para 72 contained in meeting report of the 58<sup>th</sup> meeting of CDM EB?</p>	Guidance requested from the Meth Panel	