



**CDM project activity/programme of activities registration request review form (CDM-REGR-FORM)  
(Version 03.0)**

**Section 1. General Information**

**Designated national authority/Executive Board member submitting this form (Name in print)**

**Title and UNFCCC reference number of the proposed project activity or programme of activities (PoA) submitted for registration**

9996 Electricity and heat Generating through a cogeneration system in Gerencia Refinería Barrancabermeja (GRB), Ecopetrol, S.A.

**Section 2. Basis for review request**

*Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures (the annex to decision 3/CMP.1), which validation requirements may require review. Please tick the appropriate boxes in the list of requirements below. For requesting a review of a proposed afforestation or reforestation project activity or PoA, please refer to paragraphs 12 and 15 of the CDM modalities and procedures for afforestation and reforestation project activities (the annex to decision 5/CMP.1), and tick the equivalent boxes below mutatis mutandis.*

*The following are requirements derived from paragraph 37 of the CDM modalities and procedures:*

- The participation requirements as set out in paragraph 28 to 30 of the CDM modalities and procedures are satisfied;
- Comments by local stakeholders have been invited, a summary of the comments received has been provided, and a report to the designated operational entity (DOE) on how due account was taken of any comments has been received;
- Project Participants have submitted to the DOE documentation on the analysis of the environmental impacts of the project activity, including transboundary impacts and, if those impacts are considered significant by the project participants or the host Party, have undertaken an environmental impact assessment in accordance with procedures as required by the host Party;
- The project activity is expected to result in a reduction in anthropogenic emissions by sources of greenhouse gases that are additional to any that would occur in the absence of the proposed project activity, in accordance with paragraphs 43 to 52 of the CDM modalities and procedures;
- The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board;
- Provisions for monitoring, verification and reporting are in accordance with decision 17/CP.7, the CDM modalities and procedures and relevant decisions of the COP/MOP;
- The project activity conforms to all other requirements for CDM project activities in decision 17/CP.7, the CDM modalities and procedures and relevant decisions by the COP/MOP and the Executive Board.

*The following are requirements derived from paragraph 40 of the CDM modalities and procedures:*

- The DOE shall, prior to the submission of the validation report to the Executive Board, have received from the project participants written approval of voluntary participation from the designated national authority of each Party involved, including confirmation by the host Party that the project activity assists it in achieving sustainable development;
- In accordance with provisions on confidentiality contained in paragraph 27(h) of the CDM modalities and procedures, the DOE shall make publicly available the project design document;
- The DOE shall receive, within 30 days, comments on the validation requirements from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available;
- After the deadline for receipt of comments, the DOE shall make a determination as to whether, on the basis of the information provided and taking into account the comments received, the project activity should be validated;
- The DOE shall inform project participants of its determination on the validation of the project activity. Notification to the project participants will include confirmation of validation and the date of submission of the validation report to the Executive Board;

- The DOE shall submit to the Executive Board, if it determines the proposed project activity to be valid, a request for registration in the form of a validation report including of the project design document, the written approval of the host Party and an explanation of how it has taken due account of comments received.
- There are only minor issues which should be addressed by the DOE/project participants prior to the registration of the project.

**Section 3: Comments supporting review request**

*Please elaborate the reason for requesting a review on the requirements you indicated in section 2 above.*

1) The validation report page 18 indicates that the gas turbine TG-2961 is not a cogeneration unit and the existing cogeneration units (i.e. TG-951/2, TG901/2/3) were out of service since 2005 and 2009 respectively, whereas in the PDD page 20, it is stated that "Ecopetrol has only a cogeneration system (TG-2961), ....". The PP/DOE is requested to clarify the inconsistency and elaborate the reason that the existing cogeneration units (TG-951/2, TG901/2/3) were out of service, as well as the fate of these units in the project scenario. If these units are not scrapped, the PP/DOE shall explain why repowering these units are not considered as the baseline scenario. Please refer to PS v7 paragraph 36, 38, VVS v7 paragraph 65 and 69.

2) The AM0014 v4 requires that "the methodology can only claim reductions from only that fraction of displaced electricity from the baseline dedicated power plants, for which it can be demonstrated that project activity led to reduction in generation of baseline dedicated power plant(s)". The DOE has indicated that the replaced steam turbines TG-2401/2/3 (3\*10MW) was operated at 17.75MW to 22.38MW during 2011-2013, which is lower than the installed capacity of project cogeneration unit (TG-5100 with 35MW). As per the PDD, the baseline emission from dedicated baselinen power units is calculated as  $BE_{elec,fossil\ fuel} = CEO * BE_{Felec,fossil\ fuel}$ , CEO is electricity generation metered at TG5100 and  $BE_{Felec,fossil\ fuel}$  is calculated based on three years arithmetic average of TG-2401/2/3. The PP/DOE is requested to clarify how the baseline emissions from electricity generation is calculated as per aforementioned requirement. In particular, (1) how the claimed emission reductions calculated from metered CEO that exceeding the historical generation represents the reduced generation of baseline dedicated power plant(s) TG2401/2/3, but not reduced generation of other connected existing dedicated power plant(s) like TG-2951/2/3 or TG-2961; (2) the appropriateness of using arithmetic average rather than weighted average. Please refer to PS v7 paragraph 36, 38, VVS v7 paragraph 65 and 69, VVS v7 paragraph 101, 103-105.

3) The methodology requires the monitoring of cogeneration electricity/heat supplied to the industrial plant, however as per the monitoring plan in page 38-40 of the PDD, the monitoring of electricity/heat would be conducted at the supply side, i.e. exit of steam generator and electricity generator, rather than the inlet of the recipient units. The PP/DOE is requested to ensure that the monitoring of electricity and heat supplied to the industrial plant will not be overestimated due to the location of the metering point. Please refer to VVS v7 paragraph 139(a)(ii).

Date received at UNFCCC secretariat

15 Oct 15