



# Bureau Veritas Quality International

## Initial And First Periodic Verification/Certification Report

### Response to Request For Clarification

BVQI Holding S.A. had performed the verification of the CDM Project 0282 “Bagasse based power project at Jamkhandi Sugars Limited, Bagalkot, Karnataka, India” a project of Jamkhandi Sugars Limited, Bagalkot India.

A request for issuance was made and subsequently, there have been three requests for review.

We thank the CDM executive board and the secretariat for giving us the opportunity to clarify about our considerations in the verification of the said CDM Project.

The reasons for which clarification has been sought in the three requests for review are same and is reproduced below:

*Monitoring practices did not match with frequency of monitoring parameters indicated in monitoring plan in PDD as explained below:*

- 1. Fuel – Bagasse quantity – PDD mentions that it is hourly. It is practiced on daily/monthly basis.*
- 2. Fuel –Biomass other than Bagasse quantity – PDD mentions that it is hourly. It is practiced on daily/monthly basis.*

We would like to confirm that the frequency indicated for fuel related parameters for bagasse and biomass other than bagasse in monitoring plan has not been implemented in accordance with that set out in the registered PDD. The frequency as per PDD is hourly where as the Bagasse or the Biomass other than the Bagasse is monitored on daily/monthly basis.

DOE has addressed the deviation by raising FAR-1 (at page 16 of verification report) and have ensured that the corrective action is checked during next verification visit. Organisation has acknowledged the deviation in practice and has responded positively to have the hourly monitoring. JSL has started monitoring of these parameters on hourly basis and DOE has received the evidence for the same. It is attached as Annex-1.

Evidence of cause determination for FAR-1 and evaluation of area of residual risk is also addressed in the verification report (at page 46 of Table 2).

We would also submit that while allowing the deviation the guidelines in the applicable methodology 1-D Version 8 has also been considered. The methodology



does not mention requirements for fuel consumption monitoring. Hence there is no deviation from the approved methodology.

DOE has evaluated the consequence of not monitoring the fuel on hourly basis and based on the verification of associated records, concluded that in the current verification stage there is no effect on calculated and requested CER's.

Verification team is of the opinion that in the current cycle of verification there is no reporting risk in relation to electricity supplied to the grid due to change in monitoring frequency of Bagasse or biomass other than bagasse and hence does not effect claimed and verified CER's.

DOE has verified that the system of calibration of electric meters and the accuracy and double check of readings of electricity generation and export are evaluated and these are found to be accurate.

We hope that the explanation given above clarifies the issue raised and request you to kindly give your consent to our request for issuance of Certified Emission Reductions.

Annex-1:

Evidence of hourly monitoring started with effect from 20<sup>th</sup> November 2006.