



CDM project activity registration review form (F-CDM-RR)
(By submitting this form, a Party involved (through the designated national authority) or an Executive Board member may request that a review is undertaken)

Designated national authority/Executive Board member submitting this form	
Title of the proposed CDM project activity submitted for registration	6.6 MW Sheshadri Iyer Mini Hydel Power project of Atria Hydel Power Limited at Malavalli Taluk, Mandya District, Karnataka (0522)

Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures, which validation requirement(s) may require review. A list of requirements is provided below. Please provide reasons in support of the request for review, including any supporting documentation.

- The following are requirements derived from paragraph 37 of the CDM modalities and procedures:*
- The participation requirements as set out in paragraphs 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 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 below to be filled in by UNFCCC secretariat

Date received at UNFCCC secretariat	12/09/2006
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Reasons for Request:

1. According to the validation report, the decision to build this project was made in early 2000. Neither the PDD nor the validation report indicates anywhere that the project was envisioned for CDM originally. The barrier analyses do not seem to demonstrate project additionality.

Also, the prevailing practice barrier is not plausible. It states that in India and in the state of Karnataka too, it is a common practice to invest in medium and large-scale fossil fuel fired electricity project. However, about half of the total electricity supplied to the Karnataka state grid in the fiscal year 2003-2004 is from hydro and nuclear.

The DOE's validation of baseline scenario is weak. The validation report (page 9) states that "The most economically attractive alternative among the alternatives mentioned above, i.e. Power from grid connected power plants has been selected as the baseline scenario....". However, no investment analysis has been presented anywhere in the PDD. The DOE should explain how it concluded that the existing grid is the most economically attractive one if it did not conduct an investment analysis.

2. The project has used the small-scale baseline methodology I.D. – Grid Connected renewable electricity generation. It uses the combined margin (i.e., an average of approximate operating margin and the build margin) approach to determine the baseline emission factor. The PDD, however, does not provide any data used to calculate the BM emission factor. Annex 3 of the PDD (Baseline information) provides only electricity generation data of the Southern Electricity Grid. It does not provide emission data, hence it is not clear how the operating margin emission factor, 0.997kgCO₂/kWh, is determined. It is not clear how the DOE validated emission factors (i.e., OM emission factor and BM emission factor) as data provided in the PDD are not enough to validate these factors.

3. The last paragraph in Page 6 of the PDD states that the capacity of the turbine is 3,300 kW. The table following the paragraph shows the rated capacity of the turbine as 3,475 kW. Please clarify.

4. The electricity sold (or to be sold) by the project to the grid is not available in the PDD, so it is not possible to calculate emission mitigation. Please provide electricity generation, own use (or auxiliary consumption) and electricity export for the first crediting period.