

## **RESPONSE TO REQUESTS FOR REVIEW**

Bureau Veritas Certification had performed the verification of the CDM Project No. 0534 – "6.0 MW Biomass based power project of Agri Gold Projects Limited (AGPL), Prakasham District, Andhra Pradesh".

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 validating the said project.

All the three requests raised are identical and are reproduced below:

1. The project participant did not provide detailed information regarding the weighted average emission factor of 0.683 tCO<sub>2</sub>/MWh while the monitoring report (p.5) stated that .the detailed computation work sheet of the same have been provided as annexure - 1 to this document. In addition, the DOE did not verify the emission factor in the verification report. Further clarification is required on how the DOE verified the grid emission factor in accordance with the monitoring plan and approved methodology.
2. The PP/DOE confirmed that the joint meter reading of the electricity export and import were taken on the 22<sup>nd</sup> of every month. However, this monitoring period ends on 31 March 2007. Further clarification is required on how the DOE verified the electricity export and import from 23<sup>rd</sup> to 31<sup>st</sup> March 2007.

We wish to clarify our stand for each of these issues as given below:

### **Questions**

1. The project participant did not provide detailed information regarding the weighted average emission factor of 0.683 tCO<sub>2</sub>/MWh while the monitoring report (p.5) stated that .the detailed computation work sheet of the same have been provided as annexure - 1 to this document. In addition, the DOE did not verify the emission factor in the verification report. Further clarification is required on how the DOE verified the grid emission factor in accordance with the monitoring plan and approved methodology.

### **Our Response**

Project proponent had opted for calculating the emission factor based on ex post monitoring as explained in PDD. The detailed calculations regarding weighted average emission factor of 0.683 tCO<sub>2</sub>/MWh has been provided to the DOE. However, it was not included in the documents by oversight.

In the monitoring report, there were two options of estimating emission factor.

1. The average of the "approximate operating margin" and the "build margin", where:
  - ✓ The "approximate operating margin" is the weighted average emissions (in kgCO<sub>2</sub>equ/kWh) of all generating sources surviving the system, excluding hydro, geothermal, wind, low-cost biomass, nuclear and solar generation.
  - ✓ The "build margin" is the weighted average emissions (in kgCO<sub>2</sub>equ/kWh) of recent capacity additions to the system, defined as the higher (in MWh) of most recent 20% of plants built or the 5 most recent plants;

OR

2. The weighted average emissions (in kgCO<sub>2</sub>equ/kWh) of current generation mix.

Project proponent has opted for weighted average emissions of current generation mix of Southern grid to estimate the emission factor. The verification team has verified the calculations of emission factor and accepted it as estimated at 0.683 tCO<sub>2</sub>/MWh, since this is on a conservative side in comparison of 0.72 tCO<sub>2</sub>/MWh (which will be through the first option). The statement regarding the same is now incorporated in verification report (Section 3.3.1).

Refer Annex 1 – EF weighted average- Southern grid.

2. The PP/DOE confirmed that the joint meter reading of the electricity export and import were taken on the 22<sup>nd</sup> of every month. However, this monitoring period ends on 31<sup>st</sup> March 2007. Further clarification is required on how the DOE verified the electricity export and import from 23<sup>rd</sup> to 31<sup>st</sup> March 2007.

#### **Our Response**

The practice being followed by APTRANSCO particularly for the month of March is to take two Joint Meter readings (JMR), one on the stipulated date of 22<sup>nd</sup> and a separate one on 31<sup>st</sup> March. In India 31<sup>st</sup> March is the date for closure of a financial year and therefore this is the practice. This is to ensure that financial year electricity export and import data could be recorded.

The verification team, during site visit has verified that the Meter reading taken for the first month of the monitoring period (i.e April 2006) started from 1<sup>st</sup> of April 2006, provided as Annex 2c for reference.

Validation team had accessed all the JMR's applicable to the monitoring period, which includes the above mentioned JMR's. This fact is now addressed in the revised verification report (Section 3.3.1) and also included in the Category 2 Documents. Revised Verification report is provided as Annex 3.

Refer:

Annex 2 – JMR for the period - 22<sup>nd</sup> to 31<sup>st</sup> March 2007.

Annex 2a – JMR for the period – 1<sup>st</sup> – 22<sup>nd</sup> April 2006.

Annex 2b – JMR for the period - 22<sup>nd</sup> February to 22<sup>nd</sup> March 2007

Annex 3 – Revised Verification Report, Version 02, dated:12/04/2008.

We hope that the explanation provided above is satisfactory and request you to kindly proceed with the issuance of CER's.