

**Clarifications on issues associated with validation requirements
for project activity under review**

“340 MW Gas based combined cycle power project expansion at Hazira” (2915)

Note for PP/DOE

The request for clarification below has been prepared to assist the PP/DOE in responding to the concerns of the Executive Board, as described in the scope of the review. The PP/DOE should be aware that the consideration of the review will be based on the scope of the review and any additional information considered relevant to address issues identified in this scope should also be submitted.

In responding to the questions of the review team given below, the PP/DOE should keep in mind that the initial response of the PP/DOE to the requests for review will also be considered by the review team in preparing its recommendation to the Board.

SCOPE: A review to assess the application of the baseline and monitoring methodology through an assessment of suitability of the applied emission factor for upstream fugitive methane in calculating leakage in accordance with AM0029 v3 as use of the emission factor for upstream fugitive methane for USA and Canada (160 tCH₄/PJ) in calculating the leakage has not been adequately justified.

Request for clarification to the PP/DOE:

Context:

- The DOE has indicated that the use of emission factor for fugitive CH₄ upstream emissions for Natural Gas of USA and Canada (160 tCH₄/PJ) instead of value applicable for rest of the world (296 tCH₄/PJ) is suitable as the system elements in the gas production/processing/transmission/distribution are predominantly of recent vintage (2000 - 2006) and built and operated to international standards (ISO 9001:2000 and ISO 14001:2004). However, ISO 9001:2000 and ISO 14001:2004 are management standards, and neither ISO 9001:2000 nor ISO 14001:2004 has mandatory requirements that system elements (e.g. gas production and/or processing/transmission/distribution) shall comply with international legal requirements (e.g. international standards related to gas production and/or processing/transmission/distribution). It seems that the system elements in the project activity (the natural gas production/processing/transmission/distribution) has not been built and operated to international standards as per the AM0029 v3.

Questions:

1. The PP and DOE are requested to further clarify the suitability of the applied emission factor for upstream fugitive methane in calculating leakage in accordance with AM0029 v3, in particular, how the system elements (e.g. gas production and/or processing/transmission/distribution) comply with international legal requirements (e.g. international standards related to gas production and/or processing/transmission/distribution).
2. If the PP and the DOE are unable to clarify the suitability of the use of emission factor for upstream fugitive methane for USA and Canada, emission factor for fugitive CH₄ upstream emissions for Natural Gas for rest of the world (296 tCH₄/PJ) should be applied in calculating the leakage.
