



Mr. Jürgen Stehr  
Chair, CDM Executive Board  
UNFCCC Secretariat  
CDMinfo@unfccc.int

May 24, 2007

**Ref: Review requested for request for issuance for ""Santa Candida Bagasse Cogeneration Project (SCBCP)" (Ref. no. 0065)**

Dear Mr. Stehr,

SGS has been informed that the request for issuance for the CDM project activity ""Santa Candida Bagasse Cogeneration Project (SCBCP)" (Ref. no. 0065) is under consideration for review because three requests for review have been received from members of the Board.

The requests for review are based on the reasons outlined below. SGS would like to provide an initial response to the issues raised by the request for review:

**Request for review 1:**

*"The verification report does not clearly confirm that the meters have been calibrated properly".*

**Response SGS:**

*The verification report mentions on page 6/9 para 4 that "The aspects of the monitoring plan were implemented correctly. The supporting references and data were complete and transparent"*

Specifically, calibration certificates for the meters used during the reporting period were verified and copies were obtained from the client. Calibration certificate issued on 16/05/2005 for the ELO 2180, serial number 04402/40072311-5, ABNT version 04.00, calibrator N: 0001, internal standard – P31 (current meter) was checked.

This was mentioned in the Annexure 1 of the validation report. (/7/ Calibration certificate for meter ELO 2180 number 40072311-5 (16/05/2005).

The calibration procedure and requirement on frequency of calibration was also verified. The meter is under the responsibility of concessionary company (CPFL – energy buyer). CPFL follows the procedure defined by the National System Operator (ONS).

Procedure:



Operador Nacional  
do Sistema Elétrico

## Procedimentos de Rede

Assunto	Submódulo	Revisão	Data de Vigência
MANUTENÇÃO DE MEDIÇÃO PARA FATURAMENTO	12.3	0	25/03/2002

### ANEXO I

#### RECOMENDAÇÕES ESPECÍFICAS PARA MANUTENÇÃO NAS MEDIÇÕES,

- (a) A periodicidade para a manutenção preventiva do sistema de medição deverá ser a cada 2 anos. Essa periodicidade poderá ser ampliada em função do histórico de não-conformidade observadas nas instalações;

The procedure of ONS (National Electricity System Operator) defining the periodic calibration (every 2 years) has been followed.

English translation of (a) above:

- (a) The regularity for the preventive maintenance of the measurement system will occur every 2 years. This regularity could be extended in function of the historic non-conformity observed in the installations.

**The revised verification report reflecting confirmation on the calibration checks is attached at Annexure II.**

#### Request for review:

*"The monitoring plan does not specify the requirement for monitoring of the fossil fuel used within the project boundary, but the monitoring methodology applied to this project activity stipulates this requirement. The verification report does not indicate if this requirement has been complied with by the project activity".*

#### Response SGS:

The project boundaries are in compliance with approved methodology (AM0015/Version 1, 22 September 2004) and registered PDD. The conditions specified in the PDD during validation are still the same as verified during the first verification and in this second verification.

The monitoring methodology mentions that the data required to calculate CO<sub>2</sub> emissions from fossil fuels combusted due to the project activity at the project site needs to be monitored **where relevant**. This is clearly mentioned in section E.1 of the PDD that the project activity does not burn any additional quantity of fossil fuel due to project implementation, thus **PE<sub>y</sub>=0**

Santa Candida mill produces bagasse internally which is transported to its cogeneration facility through electrical and/or mechanical conveyor belts which operate on electricity and/or steam generated in the



biomass residue cogeneration facility, hence there is no fossil fuel consumption within the project boundary or fossil fuel consumption attributable to the project activity. This is in accordance with the registered PDD (Santa Candida Bagasse Cogeneration Project (SCBCP), Version 2B, 02 December 2005, registered on 24 February 2006).

With the above explanation, we hope that the concerns of the EB have been addressed. We do however apologize if this was not sufficiently clear from the verification report.

Fabian Goncalves (+55 11 5504-8887) will be the contact person for the review process and is available to address questions from the Board during the consideration of the review in case the Executive Board wishes.

Yours sincerely

Irma Lubrecht  
Technical Reviewer  
[Irma.lubrecht@sgs.com](mailto:Irma.lubrecht@sgs.com)  
T: +31 181 693293  
M: +31 651 851777

Fabian Goncalves  
Lead Assessor  
[Fabian.Goncalves@sgs.com](mailto:Fabian.Goncalves@sgs.com)  
T: +55 11 5504 8887

Annex I: Calibration certificate for meter ELO 2180 number 40072311-5 (16/05/2005).  
Annexure II: Revised verification report dated 24/05/2007 .