

Mr. Hans Jürgen Stehr
Chair, CDM Executive Board
UNFCCC Secretariat
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December 4th, 2007

Re Request for review for request for issuance of “18MW biomass power project in Tamilnadu India (Ref. No. 0111)

Dear Mr. Stehr,

SGS has been informed that the request for issuance of the CDM project activity “18MW biomass power project in Tamilnadu India (Ref. No. 0111) for the monitoring period 1st October 2004 to 27th December 2006 is under consideration for review because three requests for review have been received from members of the Board.

The requests for review (R1, R2, R3) are based on the reasons outlined below. SGS would like to provide a response to the issues raised:

Request for clarification to the DOE/PP:

1. While the monitoring plan and methodology require the measurement of efficiency (heat rate) of the boiler, the monitoring report did not provide any monitored values of the efficiency of the boiler

Reply SGS:

As required by the monitoring plan of registered PDD, the PP monitors the efficiency (heat rate in terms of tons of fuel per MWh) of the boiler four times per year. The results for the reported period are presented in Table-1. The corresponding Excel sheet is attached as Annex 1 to this response.

Table-1:

SI No.	Month	Gross Electricity Generation	Fuel Used			Average Calorific Value of Coal & Bagasse	Heat Rate	
		KWh	Biomass	Coal	Total		Kcal / KWh	t fuel/ MWh
1	Nov-04	5535000	6641	500	7141	3275	4225	1.29
2	Feb-05	8277000	10707	782	11489	3331	4623	1.39
3	Apr-05	11364000	13937	774	14711	3287	4255	1.29
4	Jul-05	11533000	14816	737	15553	3211	4330	1.35

SI No.	Month	Gross Electricity Generation	Fuel Used			Average Calorific Value of Coal & Bagasse	Heat Rate	
			Biomass	Coal	Total		Kcal / KWh	t fuel/ MWh
		KWh	MT	MT	MT	kcal/kg		
5	Nov-05	9497000	11318	755	12073	3292	4185	1.27
6	Mar-06	9790000	11799	665	12464	4977	6336	1.27
7	Jun-06	12635000	17503	435	17938	4911	6973	1.42
8	Sep-06	11181000	15693	335	16028	4948	7093	1.43
9	Dec-06	9647000	13370	425	13795	5673	8112	1.43

The monitored values of the efficiency of boiler are incorporated in the revised monitoring report, attached as Annex 2 to this response.

2. The monitoring report stated that the plant consumed biomass including Prosopis Juliflora, rice husk and other biomass. However, the spreadsheet shows the same calorific value of biomass of 3845 Kcal/kg for this monitoring period of about 26 months. Further explanation is required on how DOE verified the calorific values

Reply SGS:

During the reported period, the project mainly used Prosopis Juliflora and only a small quantity of rice husk and other agricultural residues/wastes. The consumption of Prosopis Juliflora in the total biomass consumption is 92.1%. The calorific value analysis of biomass fuels is carried out by independent third party laboratories. As per analysis reports of Italab Salem Private Limited was found to be higher than the other laboratory reports and internal laboratory values. Hence, for conservative approach Italab average values is ascertained and if the actual values of other laboratory is considered, there is an increase of 705 CERs during the monitoring period. The project is also having an in-house laboratory facility for analysis of gross calorific value using bomb calorie meter as a quality check while receiving biomass fuels as well as coal at the project site. This is mentioned on page 10 of verification report that was uploaded with this request for issuance. The lab reports are attached as Annex 3 to this response. The PP has considered third party test results for biomass utilization in the Monitoring report attached as Annex 2 to this response.

3. The project participant is required to provide monitored values of methane in stack gas in accordance with methodology

Reply SGS:

The stack gases, including methane, have been measured quarterly during the reported period by a third party (Hubert Enviro Systems (P) Ltd. The measured values for methane have been below detectable limit (BDL) and this has been described on page 10 in the verification report which was uploaded with this request for issuance. The lab reports are also attached as Annex 4.

S.No	Date	Report No	Methane %
1	24/12/2004	1825	BDL*
2	16/02/2005	2612	BDL
3	29/04/2005	0100	BDL
4	01/07/2005	0430	BDL
5	04/08/2005	0628	BDL



S.No	Date	Report No	Methane %
6	14/11/2005	1160	BDL
7	13/01/2006	1435	BDL
8	06/02/2006	1576	BDL
9	10/05/2006	0234	BDL
10	01/08/2006	0876	BDL

- BDL – Below Detectable Limit

4. The DOE raised a CAR regarding the different boiler capacity between the registered PDD of 77 TPH by the project participant were verified and the argument was found reasonable. The DOE is required to explain how the DOE verified this difference.

Reply SGS:

During the site visit by the DOE, the PP furnished a Boiler data sheet from the boiler supplier (M/s Walchandnagar Industries Limited), which was verified by the DOE with respect to ascertaining the capacity of the boiler. Also, the certificates from the boiler inspectorate were verified to ascertain the condition and state of boiler for any significant reporting. Hence CAR was closed out as the difference was noted to be non-binding to cause any significant changes to the project activity. The boiler data sheet, Nameplate data and Boiler inspectorate certificate are attached as Annex 5 to this response. This was also mentioned under CAR4 on page 9 of verification report that was uploaded with the request for issuance.

5. The monitoring report includes electricity auxiliary consumption and electricity transmission losses which the monitoring plan does not require to monitor

Reply SGS:

The PP has monitored auxiliary electricity consumption and electricity transmission losses for cross verification and to monitor the energy efficiency of the plant. This is not affecting the calculation of emission reductions. The clarification on this was also discussed on page 9 of verification report which was uploaded with request for issuance.

Therefore, we feel that the clarification sought by board members has been taken into account. We do however apologize if this was not sufficiently clear from the earlier verification and certification report.

Pankaj Mohan (0091 9871794671) 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,

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Annex 1 Revised Excel Sheet
Annex 2 Monitoring Report
Annex 3 Calorific value of biomass
Annex 4 Methane analysis
Annex 5 Boiler data