Att: CDM Executive Board

Ref: Request for Review of the Bandeirantes Landfill Gas to Energy Project – BLFGE (registration number 0164), from 02/10/2007

Dear Members of the CDM Executive Board,

Please, find below the answers from the Project Proponents to the Request for Review above mentioned. With the explanation provided, we hope that all concerns of the EB have been addressed.

Yours sincerely,

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Phone/Fax: + 55 (11) 3819-4833 http://www.biogas-ambiental.com.br delbin@biogas-ambiental.com.br 1. While the spreadsheet includes imported electricity of 3 960MWh for this monitoring period, the monitoring report stated that "BLFGE does not consume electricity from the grid, PEy = 0." Further explanation is required on this increased electricity import from the grid and whether this level of consumption will continue in the future.

Concerning the statement written in the Monitoring Report, it's correct to affirm that BLFGE does not have any source of project emissions, as the methodology requests the calculation of the Net Electricity Generation (electricity produced – electricity consumed). The electricity consumed is related to administrative facilities, such as office, kitchen, toilets and outside illumination.

However, project proponents made mistakes with the values and with the electricity units in the calculation spreadsheet: instead of presenting the electricity consumption in kWh, the calculation was made using MWh and, also, the values presented in each PART of the monitoring report were not typed correctly – the correct electricity consumption, represented by the electricity invoices, are available in **Annex 1**. The table below shows the data used in the Calculation Spreadsheet and the real consumption of electricity:

	Value Presented in the Calculation Spreadsheet	Value presented in the Electricity Invoices
PART A (01/01/2007 to 31/01/2007)	0 MWh	2.635 MWh ¹
PART B (01/02/2007 to 31/05/2007)	1 980 MWh	7.252 MWh
PART C (01/06/2007 to 30/06/2007)	1 980 MWh	28.237 MWh
TOTAL FOR THE MONITORING PERIOD	3 960 MWh	38.123 MWh
TOTAL EMISSIONS OF CO ₂ e THAT MUST BE DISCOUNTED (EF = 0.2677 tCO ₂ e/MWh)	1 060.092 tCO₂e	10.206 tCO₂e

Also, the ratio between electricity imported and electricity exported is around 0.053%, according with the table below.

	Electricity Exported (MWh)	Eletricity Imported (MWh)
PART A (01/01/2007 to 31/01/2007)	1 1541.80	2.635
PART B (01/02/2007 to 31/05/2007)	4 8279.23	7.252
PART C (01/06/2007 to 30/06/2007)	1 1545.51	28.237
TOTAL	71 366.54	38.123

Electricity Imported / Electricity Exported = 0.053%

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¹ Decimal rounds are represented by the siymbol "."

It's concluded that the electricity consumed presented in the Calculation Spreadsheet is around 103 times bigger than the electricity really consumed. Thus, Project Participants <u>will not change</u> the values presented in the submitted Monitoring Report as their mistake is in favor of conservativeness – the calculation of Emission Reduction will be made discounting 1 060.092 tCO₂e instead of discounting only 10.206 tCO₂e.

The electricity consumption is around 1 977 kWh/month from January to May and increases in June because of the operation of the mini-blower, which is connected to the grid – Biogás will make the disconnection from the grid and will connect the mini-blower to the power house; thus it's expected that the internal consumption of electricity will stay below the 3 MWh/month.

2. The amount of LFG to the power house has been measured in accordance with the approved methodology while the monitoring plan states the calculation of the amount of the LFG to the power house. A request for revision of the monitoring plan prior should be submitted to include these changes.

The revision of the Monitoring Plan will be submitted.

3. The verification report (p. 5) stated that the verification covered "Technical aspects of sugar mill processes and bagasse cogeneration management systems." However, this project is the landfill gas project. Therefore, the DOE is requested to further clarify why they have included this competency requirement in their competence and capability of the audit team requirements and delete this scope in its verification report if an error.

Please, check the comments from the DOE.

4. The DOE shall further clarify how they have assessed and verified that the calibration frequency for the flow meters, thermometers and manometers, is appropriate as per the applied methodology.

All equipments were delivered calibrated (the calibration certificates are available at **Annex 3**). According with the manufacturers, no calibration is necessary; however, according with a German Standard, the equipments must be recalibrated every 10 years (**Annex 2**).

Adopting a conservative approach, Biogás decided to make the calibration of all equipment every 5 years, according with the internal procedure **PROCEDIMENTO DOS PARÂMETROS DE MONITORAMENTO DA USINA** (only available in Portuguese). This procedure was checked by the DOE during the on-site audit. The calibration table from the mentioned procedure is presented below:

Name	Location	Date of the last Calibration	Data of the Next Calibration
Flow-meter FIR 100	Exit Collector	August/2004	August/2009
Flow-meter FIR 200	Exit Collector	August/2004	August/2009
Pressure Transmitter	FIR 100	August/2004	August/2009
Pressure Transmitter	FIR 200	August/2004	August/2009
Tempreature Transmitter	FIR 100	August/2004	August/2009
Tempreature Transmitter	FIR 200	August/2004	August/2009

- 5. The DOE shall further clarify the rationale for the acceptance of two Forward Action Requests (FAR) issued:
 - a) Calibration of the new installed temperature devices over the main LFG pipe and the line to the flare

As the mini-blower was installed in June/2007, Biogás decided to recalibrate the temperature device at first because of the calibration price (temperature devices are the less expensive ones to calibrate) and in order to make the next calibration of all devices in a close date (close to June/2012). The recalibrations took place in October/2007 and, in advance for the next on-site audit, the certificates (available only in Portuguese) were checked by the DOE by the time of the response for this request for review.

b) Reinforcement of the data management and internal verification procedures to avoid the transfer data errors being checked in the next verification period.

Some transferring errors happened when the data stored at the PLC was transferred to the PDF report file. Biogás will acquire a new PC connected only to the PLC system. Moreover, the EMS to be implemented will reduce such errors – it's estimated that those errors correspond to 5 on every 50 000 data transferred (characterizing a non-material statistic).

ANNEX 1

ELECTRICITY INVOICES

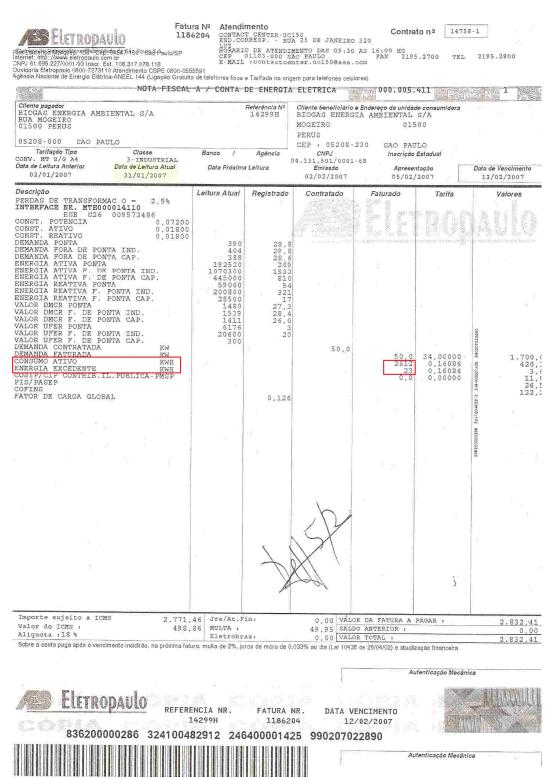


Figure 1. Invoice from the electricity consumed in January/2007

Obs: the sum of the lines CONSUMO ATIVO and ENERGIA EXCEDENTE corresponds to the total electricity consumed, in kWh.

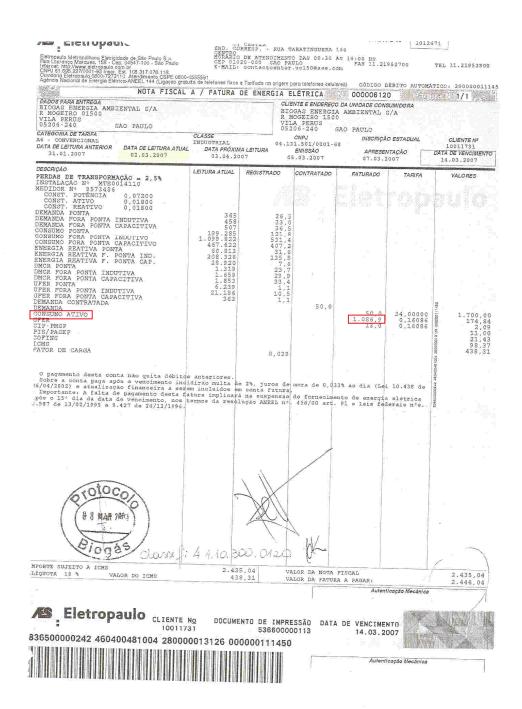


Figure 2. Invoice from the electricity consumed in February/2007

Obs: the line CONSUMO ATIVO corresponds to the total electricity consumed, in kWh.



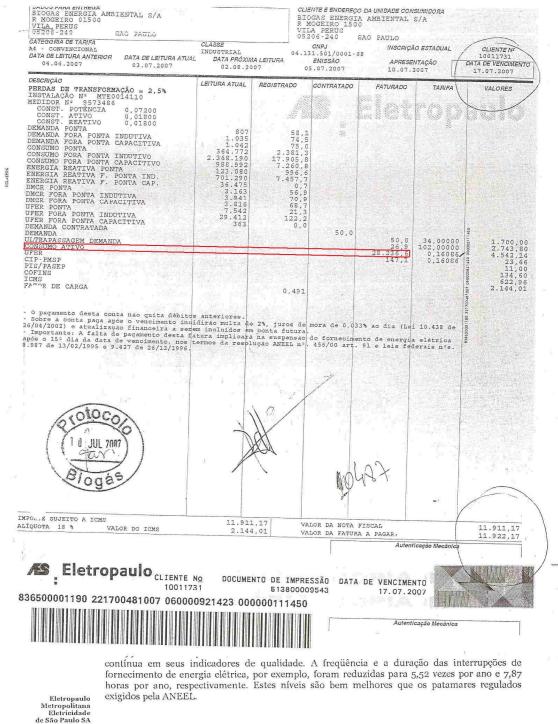
Figure 3. Invoice from the electricity consumed in March/2007

Obs: the line CONSUMO ATIVO corresponds to the total electricity consumed, in kWh.



Figure 4. Invoice from the electricity consumed in April and May/2007

Obs: the line CONSUMO ATIVO corresponds to the total electricity consumed, in kWh. In this invoice, exceptionally, two months of electricity consumption were charged at once.



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Figure 5. Invoice from the electricity consumed in June/2007

Obs: the line CONSUMO ATIVO corresponds to the total electricity consumed, in kWh.

ANNEX 2

STATAMENT FROM THE MANUFACTURER OF THE MEASURING DEVICES

ANNEX 3

CALIBRATION CERTIFICATES