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UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D-53153 Bonn
Germany

Attn: CDM Executive Board

RESPONSE TO REQUEST FOR REVIEW
LDEO Biomass Steam and Power Plant in Malaysia (0395)

With refer to the requests for review, we would like to provide the following response:

Comment 3:

The use of other biomass than EFB (mesocarp fibre and palm kernel shell) was allowed for the previous monitoring period based on the approved deviation. However up to now the project participant has used these materials continuously. A request for revision of monitoring plan should be submitted.

Our response:

The Monitoring Plan in the PDD states in Item 4 that the amount of biomass fed to the boiler must be weighed and in Item 6 that the energy content of the biomass is also to be measured annually. The specific biomass is not mentioned, so any biomass used is covered in the Monitoring Plan. In fact, LDEO has from day one weighed each biomass type fed to the boiler and also measured the energy content of the different biomass types used. Thus, it has been clear to the Project Participants that this is necessary for this project.


As well, once the Deviation Request was processed, the term "biomass" was replaced by "EFB" in the calculation table for the methane avoidance calculation, as using only EFB fed was done for even the first Monitoring Report (no changes had to be made to the first Monitoring Report, except to remove the emission reductions contributed by biomass types not covered by the Deviation Request).

We feel this is very clear for our project, but if the EB feels that more specific wording is required, we will apply for a change to the Monitoring Plan, since we will not be able to feed 100% EFB to the boiler in the near term. We are still working on increasing the

amount of EFB fed to the boiler, but it is not an easy problem to overcome. However, with the assistance of the revenue from CER sales, we believe that a solution to this problem can be achieved.

Comment 1 & 2 shall be responded by DNV.

Best Regards,

A handwritten signature in black ink, appearing to read 'AZMER SHAMSUDDIN', with a stylized flourish extending to the right.

AZMER SHAMSUDDIN
Executive Director
