

Mr. R K Sethi Chair, CDM Executive Board **UNFCCC Secretariat** CDMinfo@unfccc.int

May 16<sup>th</sup> 2008

Re Request for Request for review for issuance of the CER for "Mysore Cements Limited Portland Slag Cement Project "(Ref. no. 711)

Dear Mr. Sethi.

SGS has been informed that the request for issuance for the CDM project activity "Mysore Cements Limited Portland Slag Cement Project" (Ref. no. 0711) for the monitoring period 1 January 2001 to 31 December 2006 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 same reasons outlined below and read. SGS would like to provide a response to the issue raised by the review team:

## Request for clarification to the DOE/PP:

1. For the purpose of calculating leakage due to transport of additive materials, the spreadsheet of the monitoring report indicates 1400 kms as the distance between the source of additive and the project activity plant. However, the distance indicated in the spreadsheet for validation is different. Clarification is required how the distance between the source of additive and the project plant is verified.

SGS Reply: It was found that from the transport receipts the distance between the various sources of additive and the project activity plant (Dadd source) were

- a) 680 Km (JSW, Bellary)
- b) 700 Km (Kalyani, Hospet)
- c) 520 Km (KISCO, Kudremukh)
- d) 300 Km (VISL steel plant, Bhadravathi)
- e) and 50 Km(other sources) from the project plant

About 95% of the slag was coming in from JSW and Kalyani; NIR5 was raised as the conservativeness of the round trip distance was examined. In response to the NIR, the project proponent to be on a conservative side considered the round trip distance of the farthest source (Kalyani) i.e 700 \* 2 - 1400 Km to account for calculating the leakages. Hence, this was accepted.

2. The monitoring plan states that the baseline grid emission factor will be calculated yearly, while in the monitoring report it was reported as calculated once. Clarification is required.



**SGS Reply:** The Monitoring plan does indeed state that the baseline grid emission factor will be calculated yearly. The baseline grid emission factor as per the registered PDD is the combined margin as per ACM0002 methodology.

In the Indian scenario, as per the latest CEA (Central Electricity Authority) database Version 3 (December 2007) the combined margin for the Grid Emission Factor ranges between 0.85 to 0.86 for the monitoring period from 2001 to 2006 as depicted in the table below. The first version of the CEA data base was published in November 2006 probably after request for registration and hence the same reference were not available at the time of validation.

Combined Margin (tCO2/MWh) (excl. Imports)

	2000-01	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07
North	0.76	0.76	0.77	0.76	0.75	0.80	0.81
East	1.06	1.06	1.05	1.07	1.05	1.06	1.03
South	0.86	0.85	0.86	0.85	0.85	0.86	0.85
West	0.87	0.89	0.88	0.88	0.89	0.81	0.79
North-East	0.44	0.43	0.44	0.44	0.43	0.42	0.46
India	0.86	0.86	0.86	0.86	0.86	0.85	0.85

Source: (http://www.cea.nic.in/planning/c%20and%20e/Government%20of%20India%20website.htm )

The value of 0.996 tCO2/MWh is conservative for accounting project emissions arising due to usage of electricity from the grid as the CM as per the years have been taken as 0.996 tCO2/MWh for the southern grid of India. It is also to be noted that the registered PDD and in the validated excel sheet values till 2004 are taken as 0.996 tCO2/MWh. Hence, the baseline grid emission factor was considered by the project proponent as 0.996 tCO2/MWh and accepted by the DOE. The revised Monitoring report version 4 has been corrected for annual monitoring of grid emission factor and the same is attached as Annex 1 with this response.

Therefore, we feel that the concern for request for review requested by the 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 Monitoring Report

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