

 <p><b>CDM project activity registration review form (F-CDM-RR)</b>  <i>(By submitting this form, a Party involved (through the designated national authority) or an Executive Board member may request that a review is undertaken)</i></p>	
<b>Designated national authority/Executive Board member submitting this form</b>	
<b>Title of the proposed CDM project activity submitted for registration</b>	Energas Varadero Conversion from Open Cycle to Combined Cycle Project (0918)
<p><b>Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures, which validation requirement(s) may require review. A list of requirements is provided below. Please provide reasons in support of the request for review, including any supporting documentation.</b></p>	
<p><input type="checkbox"/> <i>The following are requirements derived from paragraph 37 of the CDM modalities and procedures:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The participation requirements as set out in paragraphs 28 to 30 of the CDM modalities and procedures are satisfied;</li> <li><input type="checkbox"/> Comments by local stakeholders have been invited, a summary of the comments received has been provided, and a report to the designated operational entity (DOE) on how due account was taken of any comments has been received;</li> <li><input type="checkbox"/> Project participants have submitted to the DOE documentation on the analysis of the environmental impacts of the project activity, including transboundary impacts and, if those impacts are considered significant by the project participants or the host Party, have undertaken an environmental impact assessment in accordance with procedures as required by the host Party;</li> <li><input checked="" type="checkbox"/> The project activity is expected to result in a reduction in anthropogenic emissions by sources of greenhouse gases that are additional to any that would occur in the absence of the proposed project activity, in accordance with paragraphs 43 to 52 of the CDM modalities and procedures;</li> <li><input checked="" type="checkbox"/> The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board;</li> <li><input type="checkbox"/> Provisions for monitoring, verification and reporting are in accordance with decision 17/CP.7, the CDM modalities and procedures and relevant decisions of the COP/MOP;</li> <li><input checked="" type="checkbox"/> The project activity conforms to all other requirements for CDM project activities in decision 17/CP.7, the CDM modalities and procedures and relevant decisions by the COP/MOP and the Executive Board.</li> </ul> <p><input type="checkbox"/> <i>The following are requirements derived from paragraph 40 of the CDM modalities and procedures:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The DOE shall, prior to the submission of the validation report to the Executive Board, have received from the project participants written approval of voluntary participation from the designated national authority of each Party involved, including confirmation by the host Party that the project activity assists it in achieving sustainable development;</li> <li><input type="checkbox"/> In accordance with provisions on confidentiality contained in paragraph 27 (h) of the CDM modalities and procedures, the DOE shall make publicly available the project design document;</li> <li><input type="checkbox"/> The DOE shall receive, within 30 days, comments on the validation requirements from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available;</li> <li><input type="checkbox"/> After the deadline for receipt of comments, the DOE shall make a determination as to whether, on the basis of the information provided and taking into account the comments received, the project activity should be validated;</li> <li><input type="checkbox"/> The DOE shall inform project participants of its determination on the validation of the project activity. Notification to the project participants will include confirmation of validation and the date of submission of the validation report to the Executive Board;</li> <li><input type="checkbox"/> The DOE shall submit to the Executive Board, if it determines the proposed project activity to be valid, a request for registration in the form of a validation report including the project design document, the written approval of the host Party and an explanation of how it has taken due account of comments received.</li> </ul> <p><input type="checkbox"/> There are only minor issues which should be addressed by the DOE / project participants prior to the registration of the project.</p>	
<b>Section below to be filled in by UNFCCC secretariat</b>	
Date received at UNFCCC secretariat	19/04/2007

**Reasons for Request:**

1. The barriers which the PP referred are not of the kind which could be verified as barriers specific to the Project, but are common ones which any investor in Cuba might face. It is dubious that there exist barriers for the project.



Also, the PP is not giving any explanation on how *"The additional revenue stream provided by CER's, if this project is registered as a CDM activity, would mitigate these barriers"* The PP shall be requested to explain/demonstrate why and how those barriers are to be alleviated by the CERs (or by the registration of the Project as CDM).

2. In page 37 of the PDD, there is a statement that "...Due to the operation of the Combined Cycle plant since March 2003, a full complement of procedures for operating the plant in a safe, sound and efficient manner had to be provided." Also in page 42, as Starting date of the project activity, March 1, 2003 is given. If the Combined Cycle plant had been completed in 2003 and was in operation, the barrier argument developed in section B.5 does not make sense.

3. The ACM0007 requests the project participants to demonstrate that the proposed project activity does not increase the lifetime of the existing gas turbines. Instead of a demonstration, the PDD has provided a statement, which is not appropriate. The residual lifetime of these equipments should be provided by the PPs.

4. The baseline scenario is the one described in page 2 of ACM0007 version 1. This has not been sufficiently substantiated. Also, the project undertaken without being registered should be included in the list of the plausible alternatives to the project activity.

5. No information is provided concerning the temperature of the recovered waste heat, the pressure of the HRSG. Also no information is provided concerning the energy flow rate at the inlet of the HRSG related to the waste gas recovery.