Mr. Rajesh Kumar Sethi

Chair, CDM Executive Board

UNFCCC Secretariat

CDMinfo@unfccc.int

26th November 2008

Re: Request for review of the request for issuance for the CDM project activity " Jinan landfill gas to energy project " (UNFCCC Ref. No. 0933)

Dear Mr. Sethi,

SGS has been informed that the request for issuance for the CDM project activity " Jinan landfill gas to energy project " (UNFCCC Ref. No. 0933) 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 reason as outlined below. Through this letter we would like to comment on the reason for review and provide additional information for clarification.

Reason for the request for review:

The DOE is requested to clarify how it verified that the clarification by the meth panel (AM_CLA_0095) on the application of lower bound of 95% confidence interval had been followed, since the monitoring of methane fraction in LFG was not conducted continuously

SGS response:

Before this verification, SGS submitted AM_CLA_0095 seeking clarification on how the "statistically significant number of samples" can be determined ex-ante before assessing whether or not the 95% confidence interval is met. In the clarification dated 27/06/2008, Meth Panel recommends allowing the option of conducting periodical measurements with a minimum of 4 quarterly measurements per year and the lower bound of the 95% confidence interval is to be used.

This clarification had been taken into account during verification, the reason why a different approach for calculating the methane emission in the baseline was accepted is as following:

1) As what has been described in the verification report, in this monitoring period (01/10/2007 – 30/04/2008, seven months), total 623 measurements have been taken for this 7 months period under verification, this is 155 times higher than the frequency for 12 months considered in the clarification, and measurement was taken every 8 hrs, which gives a good representative spread methane concentrations covering the morning, midday and evening periods.

2) Also in the verification report, a test of confidence interval at 95% confidence level for the actual results had been performed in the 'main' worksheet of the CER spreadsheet, getting a confidence interval of ±0.202% under the 95% confidence interval with the average W_{CH4} of 53.138%. The variation of W_{CH4} during this monitoring period is considered as limited (53.138%±0.202%, ie, 52.94% – 53.34%), 0.202% difference between the mean value and the lower bond value is just ignorable. This can be further justified by using the same rational given in AM_CLA_0095 to crosscheck the calculation result in the monitoring report: When lower bound of the 95% confidence interval obtained from the 623 periodical measurements (52.94%) is used to calculate the quantity of methane destroyed by the project, it arrives at 760.27tCH4 (The PP used the rounded value of 760tCH4 in their response, see highlighted figures in CER spreadsheet, **Annex 1** to this response), The final claimed methane quantity for this monitoring period in version 02 of the monitoring period dated 15/07/2008 that was uploaded for issuance request was reported to be **760**tCH4.

Considering the good representativeness of measurements, and ignorable variation when using lower bond value, SGS accepted PP's approach using each direct measurements to compute the total methane emission in the baseline.

We hope that this letter and the attached documents address the concerns of the Board. If further information is required, Joe Sun (Joe.sun@sgs.com and +86 13817041095) 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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Enclosure:
Annex 1 Revised CERs calculation spreadsheet