

 CDM project activity registration review form (F-CDM-RR) <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>	
Designated national authority/Executive Board member submitting this form	
Title of the proposed CDM project activity submitted for registration	1114 4MW Waste Heat Recovery based power project by GRSPL, India
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.	
☐ <i>The following are requirements derived from paragraph 37 of the CDM modalities and procedures:</i> ☐ The participation requirements as set out in paragraphs 28 to 30 of the CDM modalities and procedures are satisfied; ☐ 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; ☐ 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; ☒ 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; ☒ The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board; ☒ 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; ☐ 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. ☐ <i>The following are requirements derived from paragraph 40 of the CDM modalities and procedures:</i> ☐ 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; ☐ 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; ☐ 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; ☐ 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; ☐ 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; ☐ 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. ☐ There are only minor issues which should be addressed by the DOE / project participants prior to the registration of the project.	
Section below to be filled in by UNFCCC secretariat	
Date received at UNFCCC secretariat	

- Many of the technological barriers listed appear to be operational problems related to the use of the kilns rather than the implementation of the project activity. The prevailing practice barriers appear to relate to the further investment and corporate restructuring taken by the project participant to avoid wheeling charges. Further justification of the identified barriers and how the CDM will overcome them is required.
- The project activity involves steam generated from a waste heat recovery boiler to produce 4MW of power through a 8MW turbine at the same time a coal based boiler is installed to generate the remaining 4MW of power. The two boilers are connected via a common header. Therefore, 4MW of



grid power is displaced by the project activity and at the same time 4MW of grid power is displaced by coal based power. Because an 8MW turbine is installed, they are interdependent. Therefore, the emissions from the coal based power should be included in the project emissions. If they are not considered to be interdependent, then the baseline scenario should have included the installation of 4MW of coal based power. Therefore, it is unclear if the methodology is applicable and/or whether the methodology is correctly applied. Further, it is stated in the PDD that "...unit power generation is the lowest for the coal/char based power plants." However, electricity from the grid has been chosen as the baseline scenario.

3. It is unclear whether the monitoring methodology is applicable and/or has been correctly applied. In the project activity, the net electricity supplied to the facility is calculated using a pro-rata for the fraction of total steam supplied by the waste heat recovery boiler to the turbine. This is not in accordance with the methodology which requires the net electricity supplied to the facility to be calculated by subtracting the measured auxiliary electricity from the measured total electricity generated.
4. The proposed start date of the crediting period should be changed to the date of registration.