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UNFCCC Secretariat
Martin-Luther-King Strasse 8
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Att: CDM Executive Board

Your ref:
CDM Ref 1832

Date:
18 September 2008

Response to request for review
"Methane fired power generation plant in Samrong Thom Animal Husbandry, Cambodia" (ref.1832)

Dear Members of the CDM Executive Board,

We refer to the requests for review raised by three Board members concerning the request for registration of the "Methane fired power generation plant in Samrong Thom Animal Husbandry, Cambodia" (1832).

The issues raised by the review requests, and the response from Mitsubishi UFJ Securities (MUS), acting as the CDM consultant to Samrong Thom Animal Husbandry (STAH), are set out below:

Comment #1. AMS-I.A is applicable to "technologies that produce electricity all of which is used on-site by the user". This project activity involves export of power production. The DOE is therefore requested to substantiate how the applicability of the methodology has been validated.

Response :

Due to the fact that it is becoming clear that the plan to export electricity to nearby users is unlikely to be implemented for several years, it has been decided not to claim CERs from this source. The PDD has been amended to take account of this in the following ways:

1. retain references to supply of electricity to outside users in the project description in Section A, and other appropriate sections of the PDD.

2. include a monitoring provision that electricity sold / supplied to outside will be monitored, and that CERs will only be claimed for the portion of electricity that is actually consumed by STAH.

Comment #2. Projects applying AMS-III.D must "ensure that all biogas produced by the digester is used or flared". As the power demand from this project activity is unclear and no flare is installed the DOE is requested to explain how compliance with this applicability condition has been validated.

Response :

Originally the PPs were planning to install the gas recovery system without flaring. However, they have a contingency plan to install a flare in the future in order to regulate gas pressure if there is a problem with the gas engines, or if an increase in pig numbers leads to a surplus of gas. For purposes of transparency, the provision for flaring has been added to the PDD, with appropriate monitoring items added, although the estimated baseline emissions for this section is entered as zero [0] (see monitoring item $BG_{burnt,F,y}$.)

Comment #3. The compliance of the baseline emission factor of 1.3tCO2/MWh for exported power with the methodology requires further substantiation.

Response :

As per response to comment #1 above, CERs will no longer be claimed for this source.

Comment #4. Further clarification is required regarding how the efficiency of the combustion process will be monitored and the basis of the values which will be applied in determining CERs

Response :

Our understanding is that this relates to the combustion efficiency of the gas engines, in terms of portion of methane oxidised compared to the amount of methane input to the engines. In line with the updated information regarding flaring, this will also apply to flaring as well.

The operation of the gas engine will be monitored to ensure that it is being operated in

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line with the manufacturer's instructions. Typically, a gas engine will operate with a combustion efficiency of 99% or above. ACM0008 gives a default value of 99.5% for efficiency of methane destruction in power plants. However, the highest value permitted by AMS-III.D without detailed monitoring of the exhaust gases (which is not considered economical for the Project) is 90%. This default of 90% is adopted as a conservative value.
For any gas flared, the 50% default value will be used, with monitoring of the flare's temperature, as stipulated by AMS-III.D.

The above comments have been reflected in a new version of the PDD (Version 3).

We, and STAH, hope that the Board accepts the above explanations and look forward to the registration of the project activity.

Yours faithfully,

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