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Date
01.08.2008

Request for Review

“GCL biomass gasification based power generation” (1760)

Dear Sir/Madam,

Please find below the response of the project participant (Garg Casteels Private Limited) and the TÜV NORD JI/CDM Certification Program to the four (4) requests for review for the above mentioned project no. 1760.

If you have any questions do not hesitate to contact us.

Yours sincerely,

TÜV NORD JI/CDM Certification Program

Rainer Winter

Request for Review (1-1,1-2,1-3,1-4)	
Issue raised by EB Members / DNA	1. The DOE should clarify with appropriate evidence the starting date of the project activity
Response of project participant	Please see separate response.
Response of DOE	<p>As per the UNFCCC glossary of CDM terms the starting date of the project activity is the earliest date on which the project's implementation or real action or the construction activity takes place.</p> <p>During the course of validation the project proponent has provided purchase order of the first gasifier as the start date of the project activity to the DOE, dated 2004-09-30. Even if this document is not included in the table of provided documents as reference (table 7-1 Validation Report) this date is clearly stated in table 1-3, page 8 of the validation report.</p> <p>The DOE has considered the purchase order as the evidence of the start date, which indicates the real action taken by the project participant.</p> <p>Contact person:</p> <p>Ms. Katja Beyer TÜV NORD CERT GmbH Langemarckstr. 20 45141 Essen Tel: +49 – 201 – 825 2755 Mobile: +49 160 888 66 12 Fax: +49 – 201 – 825 2139 email: kbeyer@tuev-nord.de</p>

Request for Review (2-1,2-2,2-3,2-4)	
Issue raised by EB Members / DNA	2. The PP/DOE should explain the delay of nearly three years between project start date and submission of the project for validation to show that CDM revenues were considered essential in the decision to invest in the project activity. The response should provide a detailed timeline of project implementation with relevant, preferably third-party, evidences of the prior consideration of CDM.
Response of project participant	Please see separate response.
Response of DOE	<p>The genesis of the project activity was submitted to the validation team during the validation.</p> <p>The detailed timeline of the project activity implementation with relevant third party evidences are described in chronological order in the separate response given by the project participant. These documents e.g. management decision, starting date, purchase order of the gasifiers, land lease document were made available to the DOE during the course of validation for clarification of the history of the project, which were also included in the validation report (refer Table 7-1 Validation Report, page 29 ff., e.g. /BIO/, /HCA/, /PO/).</p> <p>The reasons for delay of nearly three years between the start date and submission of the project for validation are well substantiated by the project participant. However, the prime reasons for the delay are as follows ;</p>

	<p>1. Longer gestation period: (1st PO date : 30/09/2004 Commissioning date; 25/08/2007)</p> <ul style="list-style-type: none"> - Longer Manufacturing time: Gasifiers were delivered after one year of placing purchase orders as such large capacity biomass gasifiers were being manufactured for the first time by the manufacturer. (Annex-3) - Longer commissioning time: Commissioning took a lot of time because no technology provider could provide GCL with end to end solution and GCL had to depend on various technology suppliers to commission its power plant on 100% gas mode. <p>2. In experienced consultant: The CDM consultant appointed during initial phase of project development failed to provide consultancy services to GCL in time, which led to further delays (Annex-4 and Annex-14). In June 2006 GCL decided to appoint a more experienced consultant (Annex-9) and contracted the second company in November 2006 (Annex-8).</p> <p>3. Delay in lease approval: It took a longer time to obtain the land lease document from the local government authority (date of application: November 2004, Annex-11, land lease approval: January 2006, Annex-13).</p> <p>Contact person:</p> <p>Ms. Katja Beyer TÜV NORD CERT GmbH Langemarckstr. 20 45141 Essen Tel: +49 – 201 – 825 2755 Mobile: +49 160 888 66 12 Fax: +49 – 201 – 825 2139 email: kbeyer@tuev-nord.de</p>
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Request for Review (3–1,3-2,3 -3,3-4)	
Issue raised by EB-Members / DNA	3. Relevant information on the remaining operation life of the DG is required.
Response of project participant	Please see separate response.
Response of DOE	<p>The condition of the DG sets was checked during the on-site visit. The arguments presented by the project proponent in support of the DG set residual life-time beyond the 10 year crediting period are well-supported by documented assessment of a third party (Annex-12).</p> <p>During course of validation, in view of the DG residual life CAR B3 was raised and closed to revise the monitoring plan for the ex-post monitoring of any leakage, arising from the shifting of DG sets outside the project boundary.</p> <p>Moreover, the evidence for the remaining operational life time of the DG sets provided by the participant adequately substantiates the remaining operational life time as 15 years, considerably more than the crediting period.</p>

	<p>Contact person:</p> <p>Ms. Katja Beyer TÜV NORD CERT GmbH Langemarckstr. 20 45141 Essen Tel: +49 – 201 – 825 2755 Mobile: +49 160 888 66 12 Fax: +49 – 201 – 825 2139 email: kbeyer@tuev-nord.de</p>
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