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**Att:** CDM Executive Board

Your ref.:  
CDM Ref 0717

Our ref.:  
KCHA/MLEH

Date:  
30 July 2008

## **Response to request for review - Issuance of CERs regarding “India Cements WHR project” (0717)**

Dear Members of the CDM Executive Board,

We refer to the requests for review raised by three Board members concerning DNV's request for issuance of the CERs from “India Cements WHR project” (0717) and would like to provide the following initial response to the issues raised by the requests for review.

### **Comment 1:**

*The monitoring report uses an ex-post grid emission factor of 0.85tCO<sub>2</sub>/MWh while the DOE verified that the combined margin emission factor of 0.86 tCO<sub>2</sub>/MWh has been applied.*

### **DNV Response:**

DNV would like to clarify that the emission factor of 0.85 t CO<sub>2</sub>/MWh which has been used in the CER calculations, has been correctly sourced from the CO<sub>2</sub> baseline database published by the Central Electricity Authority of India. The value of 0.86 t CO<sub>2</sub>/MWh as mentioned in the verification report has been a typographical error. This has been corrected in the revised verification report attached with this response. DNV sincerely apologizes for this error.

### **Comment 2:**

*The emission factor for coal was taken from the latest IPCC 2006. However, the methodology requires the use of local values where available or specific-country values and the use of IPCC world-wide default values as the last option.*

### **DNV Response:**

DNV agrees that as per the methodology, country specific values for the emission factor of coal should be used as the first choice. In India, the emission factor of coal is provided by “India's Initial National Communication to the United Nations Framework Convention on Climate Change” published by the Ministry of Environment and Forests, Government of India, in 2004. As per page 37 of this document the emission factor for coal is mentioned to be 26.13 t C/TJ which is lower than the IPCC default value of 26.2 t C/TJ. Since, for this project activity the emission factor of coal is required for calculating the project emissions, using the IPCC default value has resulted in conservative estimate of the emission reductions. The project emissions as calculated using the IPCC default values come to 63.823 t CO<sub>2</sub> where as it is 63.630 t CO<sub>2</sub> while using the India specific emission factor value. Thus the use of IPCC default value is acceptable

as it results in conservative estimate of the emission reductions. This explanation has now been provided in the revised verification report attached with this response.

**Comment 3:**

*Baseline emissions, project emissions and final CERs in the monitoring report are different from those presented in the spreadsheet.*

**DNV Response:**

The baseline emissions, project emissions and final CERs vary from the figures provided in the monitoring report in the second decimal point and maybe due to non-uniform rounding-off of the decimal points in the monitoring report and the excel spreadsheets. However, a revised excel sheet for the emission calculations is also attached with this response in which the figures match exactly with the figures provided in the monitoring report. DNV also requests the Executive Board to note that though the project proponent has reported the emission reductions to be 47 550.71 t CO<sub>2</sub> in the monitoring report, DNV has conservatively verified and certified the emission reductions to be 47 550 t CO<sub>2</sub> in the verification report thus ignoring the decimal points in the reported emission reductions.

We sincerely hope that the Board accepts our aforementioned explanations.

Yours faithfully  
for DET NORSKE VERITAS CERTIFICATION AS



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