



**CDM project activity/programme of activities registration request review form (CDM-REGR-FORM)
(Version 03.0)**

Section 1. General Information

Designated national authority/Executive Board member submitting this form (Name in print)	
Title and UNFCCC reference number of the proposed project activity or programme of activities (PoA) submitted for registration	9468 Grid-connected Biomass Power Plant at Takli District of Nakhon Sawan Province in Thailand

Section 2. Basis for review request

Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures (the annex to decision 3/CMP.1), which validation requirements may require review. Please tick the appropriate boxes in the list of requirements below. For requesting a review of a proposed afforestation or reforestation project activity or PoA, please refer to paragraphs 12 and 15 of the CDM modalities and procedures for afforestation and reforestation project activities (the annex to decision 5/CMP.1), and tick the equivalent boxes below mutatis mutandis.

The following are requirements derived from paragraph 37 of the CDM modalities and procedures:

- The participation requirements as set out in paragraph 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.

The following are requirements derived from paragraph 40 of the CDM modalities and procedures:

- 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 of 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 3: Comments supporting review request

Please elaborate the reason for requesting a review on the requirements you indicated in section 2 above.

1) The DOE is requested to further substantiate how it has validated the input values to the investment analysis; in particular: a) steam price, considering that it is not clear how the DOE has validated the calculation for steam price and cross checked against third-party or publicly available sources such as invoices or price indices price; b) average cost of fuel (bagasse), considering that it is not clear how the DOE has validated the quotation/FSR value and cross checked against third-party or publicly available sources such as invoices or price indices and; c) operation and maintenance expenses and auxiliary consumption of electricity, considering that the validation is only based on the feasibility study report of the project activity and the assumed values have not been cross checked against third-party or publicly available sources.

In doing so, the DOE is requested to further clarify the following information i) the ownership/relationship among Thai Identity Sugar Group (TIS), the PP and other three entities that receive the electricity and steam from the project activity, ii) any agreement signed between the PP and other three entities for supply of electricity and steam and the agreed tariff for electricity and steam; and iii) any agreement signed between the PP and KTIS and RP sugar mills for supply of bagasse and the agreed price for the bagasse

Please refer to Paragraph 111(a) and (b), VVM version 1.2.

2) The DOE is requested to explain how it has eliminated baseline scenarios, in particular : a) P5, P6 and H5, considering that the PP/DOE have not justified why installation of new plants based on renewable energy projects (including wind, hydro, solar, terrestrial, biomass based with lower efficiency) and fossil fuels (coal, oil, natural gas) at the project site is not realistic and credible baseline alternatives for quantum of electricity/heat supplied to identified users and grid; b) B1 and B3, considering that the PDD (page 18-19) mentions that B1 and B3 are plausible baseline scenario whereas these options are eliminated in the validation report (page 20); c) B5 and B7, considering that the PDD and VR have not provided detail specific information regarding any survey or statistics to demonstrate that biomass residues are readily available and there is an abundant surplus of biomass in the region. Furthermore, the DOE is requested to rectify the inconsistencies observed in PDD and VR on reporting baseline scenarios such as: i) The PDD and VR mention the plausible and credible baseline scenarios for the heat generation are H1 and H5. However, it should be H1 and H6; b) The VR page 20 mentions that the identified baseline for biomass is B4 but at the same page it is noticed that the DOE has excluded all the options except B8. Page 19 of PDD indicates the identified baseline scenario for biomass is B1 or B4 but in page 34 it is mentioned as B8. Please refer to Paragraph 81-88, VVM version 1.2.

Date received at UNFCCC secretariat

19 Aug 13