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Att: CDM Executive Board

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CERTIFICATION AS

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Your ref.:	Our ref.:	Date:
CDM Ref 0191	MLEH/BLARA	8 April 2008

Response to request for review
Monte Rosa Bagasse Cogeneration Project (MRBCP) (0191)

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 for project activity 0191 entitled "Monte Rosa Bagasse Cogeneration Project (MRBCP", and we would like to provide the following response to the issues raised by the requests for review.

The PDD stipulates that the second phase of the project (comprising the installation of one 15 MW condensing turbine and 2x20 MW extraction turbines) would be done for 2004 over 5 year period and old generators would be retired. However the monitoring report and the verification report do not specify the status of the installation of these turbines to confirm the source of the electricity supplied to the grid.

DNV Response:

The chronological events for the project are described in detail in Appendix A of this document. During the 2004-2005 cane season, under purchase order number 006925, dated 22 May 2003, Monte Rosa authorized the purchase of a condensing turbo generator with a nominal capacity of 16.4 MW to the company UNI-SYSTEMS INC, in order for this company to proceed to the manufacturing of the equipment and then its shipment from Brazil to Nicaragua. The equipment entered by land by the frontier post of El Guasaule, during the period from 1 April to 28 April 2004. See Annex I for details of the equipment documentation.

Under purchase order number 0088273, dated 3 February 2004, Monte Rosa authorized the purchase of an extraction turbo generator with a nominal capacity of 20 MW to the company UNI-SYSTEMS INC, in order for this company to proceed to the manufacturing of the equipment and then its shipment from Brazil to Nicaragua. The equipment entered by land by the frontier post of El Guasaule, during the period from 18 September to 30 October 2004. See Annex II for details of the equipment documentation.

During the period from 21 September to 23 December 2004, the assembly and operation tests of the condensing turbo generator and the extraction turbo generator No. 1 were carried out by the company TGM Turbinas. The generators were ready to operate for the first time in the 2004-2005 cane season, and the tests were made by representatives of the company WEG.

During the month of March 2005, Monte Rosa began the disassembly of the 15 MW extraction generator, in order to start the installation of the second 20 MW turbo generator. The 15 MW extraction generator was sold to Concepción Sugar Mill, located in Escuintla Guatemala, with invoice number 0222, dated 1 November 2005. The equipment was sent by land to Guatemala on 11 April 2005. See Annex III for document details.

Finally, under service order number 0004765, dated 17 November 2004, Monte Rosa authorized the purchase of a 20 MW generator to the company INTERUNION COMERCIO INTERNACIONAL. This purchase was shipped to Nicaragua on 12 October 2005. The turbine and its accessories were purchased to the company UNI-SYSTEMS INC., with service order number 0004770, dated 17 November 2004. The installation and assembly of all the components of the No. 2 20 MW extraction turbo generator were made by the company TGM Turbinas, during the period from 30 October to 29 December 2005, allowing the generator's operation to begin on the 2005-2006 cane season. The date of entry into Nicaragua was from 28 September to 22November 2005. See Annex IV for details of the equipment.

The verification report does not include an assessment of how the following requirements of the monitoring methodology AM0015 have been met:

- The bagasse to be used as the feedstock for cogeneration shall be supplied from the same facility where the project is implemented.

- The implementation of the project shall not increase the bagasse production in the facility.

- The bagasse at the project facility should not be stored for more than one year.

DNV Response:

We would like to note that the above parameters are applicability criteria for applying the baseline and monitoring methodology AM0015. Compliance with these applicability criteria is evaluated during the validation of the project design. Neither AM0015 nor the monitoring plan contained in the registered PDD of project activity 0191 requires the ex-post monitoring of these parameters. The Board is thus requested to clarify whether project participants are expected to report on the continuous compliance with the applicability criteria of the selected methodology during each monitoring and verification period and whether DOEs are expected to verify that the project still meets the applicability criteria in addition to verifying that the project was implemented as described in the PDD.

Below is DNV's confirmation that the project's continuously meets the applicability of AM0015.

The bagasse used in the production of energy at Monte Rosa is directly obtained from the milling process of sugar cane, and no bagasse from sources outside of the Monte Rosa sugar mill is used.

The objective of implementing the cogeneration project began from Monte Rosa's idea of taking advantage, in a sustainable and profitable way, of the bagasse generated as a residue of the process of production of sugar, considering the possibility of generating CERs under the Kyoto Protocol, and never with the purpose of becoming a company dedicated exclusively to power generation. The increase in the production of bagasse has occurred as a result of the periodic increases of the sugar mill's grinding capacity, intended primarily to raise levels of sugar production. See table below.

Cane Season	Metric Tons of Cane Milled	Equivalent Metric Tons of Sugar Produced
2002-2003	1,128,554.93	109,716.05
2003-2004	1,499,201.49	161,388.23
2004-2005	1,532,539.45	165,122.01
2005-2006	1,408,329.33	152,109.21
2006-2007	1,680,252.37	178,381.01

Most of the bagasse generated by the mill is immediately burned in the boilers. Stock of excess bagasse is kept on the yard beside the boilers, which is burned during the time when the mill is not working (downtime). At the end of the season, a small amount of bagasse is kept until the next season begins, which at the most will occur six months later, in order not to make necessary any burning of fuel oil in the next start up.

We sincerely hope that the Board accepts our aforementioned explanations.

Yours faithfully
for DET NORSKE VERITAS CERTIFICATION AS

Michael Lehmann
Technical Director
Climate Change Services

Appendix A
Chronological Table

Equipment	Date	Document	Description of Documents	Date of Shipment	Customs Clearance
16.4 MW Condensing Turbo Generator	May 22, 2003	Purchase order No. 0069525 given by Monte Rosa, S.A. to the supplier UNI-SYSTEMS, INC. Florida, USA.	Purchase order of the 16.4 MW, 13800 V 60 Hz-900 psig 900 oF condensing turbo generator.	In accordance with the following invoices.	In accordance to customs documents number 2004 0230 A 1198, 2004 0230 A 1154,2004 0610 A 10437
	February 02, 2004	Commercial invoice No. 200130. Company UNI-SYSTEMS, INC. Florida, USA.	Partial shipment of the 16.4 MW 13800 V y 60 Hz, 900 oF condensing turbo generator including: 20,600 KVA generator, WEG brand, SSW model, synchronic, three-phase, closed type, and a set of spare parts.	February 13, 2004. Santos, SP. Brazil.	April 28, 2004, in customs clearance El Guasaule, Nicaragua.
	February 18, 2004	Commercial invoice No. 200133. Company UNI-SYSTEMS, INC. Florida, USA.	Second partial shipment of 16.4 MW 13800 V y 60 Hz, 900 oF condensing turbo generator including: part of the vapor turbine, heat exchangers and accessories.	February 24, 2004. Santos, SP. Brazil.	April 01, 2004, in customs clearance El Guasaule, Nicaragua.
	February 18, 2004	Commercial invoice No. 200134. Company UNI-SYSTEMS, INC. Florida, USA.	Third partial shipment of 16.4 MW 13800 V y 60 Hz, 900 oF condensing turbo generator including: vapor turbine and surface condenser.	March 05, 2004, Santos, SP. Brazil.	April 25, 2004, in customs clearance El Guasaule, Nicaragua.
	September 21 to December 23, 2004	Daily record of turbo generators´assembly work. Made by the Brazilian company TGM.	The daily records include assembly activities of the 16.4 and 20 MW turbo generators.		
20 MW Extraction Turbo Generator No. 1	February 03, 2004	Purchase order No. 0088273 given by Monte Rosa, S.A. to the supplier UNI-SYSTEMS, INC. Florida, USA.	Purchase order of 25 MW, 13,800 V turbo generator and its specifications.	In accordance with the following invoices.	In accordance to customs documents number 2004 0230 L 268,2004 0230 L 277, 2004 0230 L 276,L 309 L 32, 2004 0110 L 761, 2004 0230 L 321.

	August 06, 2004	Commercial invoice No. 200169. Company UNI-SYSTEMS, INC. Florida, USA.	First partial shipment of the 25 MW turbo generator including: vapor turbine of multi stages, TGM brand, TM type, 25000 A, 20000 KW nominal, with accessories.	August 11, 2004. Port of Río de Janeiro, Brazil.	September 30, 2004, in customs clearance El Guasaule, Nicaragua.
	August 06, 2004	Commercial invoice No. 200169. Company UNI-SYSTEMS, INC. Florida, USA.	First partial shipment of the 25 MW turbo generator including: vapor turbine of multi stages, TGM brand, TM type, 25000 A, 20000 KW nominal, oil tank, isolation and accessories.	August 11, 2004. Port of Río de Janeiro, Brazil.	September 30, 2004, in customs clearance El Guasaule, Nicaragua.
	August 06, 2004	Commercial invoice No. 200183. Company UNI-SYSTEMS, INC. Florida, USA.	Partial shipment of the 25 MW turbo generator including: Renk-Zanini 22,800 KW reduction device, 6000/1800 RPM, of one stage, with accessories.	August 11, 2004. Port of Río de Janeiro, Brazil.	September 30, 2004, in customs clearance El Guasaule, Nicaragua.
	August 06, 2004	Commercial invoice No. 200187. Company UNI-SYSTEMS, INC. Florida, USA.	Partial shipment of the 25 MW turbo generator including: WEG SSW 1120 generator of 25000 KVA 13800 V and 40 D6 IP 54-60 HZ.	September 15, 2004. Port of Río de Janeiro, Brazil.	October 25, 2004, in customs clearance El Guasaule, Nicaragua.
	September 15, 2004	Commercial invoice No. 200189. Company UNI-SYSTEMS, INC. Florida, USA.	Partial shipment of the 25 MW turbo generator including: 01 set of accessories for the metallic cover, adjustment and security tab, instrumentation, devices, 01 drawer valve, and 01 exhauster for the cover.	September 15, 2004. Port of Río de Janeiro, Brazil.	October 30, 2004, customs clearance El Guasaule, Nicaragua.
	September 15, 2004	Commercial invoice No. 200195. Company UNI-SYSTEMS, INC. Florida, USA.	Partial shipment of the 25 MW turbo generator including: motorized balloon valve DN 12´´ 900# with a by-pass for the vapor turbine.	September 19, Campinas, Brazil.	October 04, 2004, in central air customs, Managua, Nicaragua.
	September 22, 2004	Commercial invoice No. 200190. Company UNI-SYSTEMS, INC. Florida, USA.	Partial shipment of the 25 MW turbo generator including: Command square 2 and cubicles plus PNW20.86. Protection and feeding of the 25 MW/13.8 KV/1046A generator, made up of: 02 cubicles CWMT and 01 panel and 01 power transformer.	October 6, 2004. Viracopos Airport, SP. Brazil.	October 30, 2004, in customs clearance El Guasaule, Nicaragua.
	September 21 to December 23, 2004	Daily record of turbo generators´assembly work. Made by the Brazilian company TGM.	The daily records include assembly activities of the 16.4 (OS 40392) and 20 MW (OS 40437). turbo generators.		

Removal of 15 MW Extraction Turbo Generator	April 06, 2005	Letter of authorization of sale of 15 MW turbo	The president of the board of directors of Monte Rosa, S.A, authorizes the sale and export of 1 Turbine TGM,SERIES TM 15000		
	April 06, 2005	Sale invoice of 15 MW turbine	Quantity 1 Turbine TGM		
	September 12, 2005	Packing list of turbine sold to Concepción Sugar Mill in Guatemala.	Dispatch of parts of turbine composed by: turbine spare parts, two sets of spare supports of the generator of the casing of the turbine, vapor pipes of 12, and separator ball for 600 PSI.	In accordance with the following export document.	
	April 14, 2005	Export of 15 MW turbine support.	Export of TGM turbine.		
	November 1, 2005	Sale invoice of 15 MW turbo.	Sale of complete TGM turbo to Concepcion Sugar Mill.		
20 MW Extraction Turbo Generator No. 2	November 17, 2004	Service order No. 0004765 given by Monte Rosa, S.A. to the supplier r INTERUNION COMERCIO INTERNACIONAL. Brazil.	Service order of a synchronic turbo generator, ATB type, with ´excitatriz´ without brushes, 25000 KVA, power factor: 0.8, IV poles, 60 Hz, 1800 RPM, 13800 V, isolation: class F, with rotator axis prepared for rigid joining, Gevisa brand.	In accordance with the following invoices.	In accordance to customs documents number 2005 0230 L 353, document L 276
	November 17, 2004	Service order No. 0004770 given by Monte Rosa, S.A. to the supplier UNI-SYSTEMS, INC. Florida, USA.	Service order of a TGM bipartite turbine, type: TME 25,000 A to 900 psig, 950 oF, ext - 150 psig, esc - 20 psig, designed to generate 16.5 MW. Renk reduction device, type TA-71N, 22.8 MW - 1.3 FS, 5985/1800 RPM.	In accordance with the following invoices.	In accordance with documents of customs clearance Nicaragua.
	November 17, 2004	Commercial invoice No. 030546. Company INTERUNION COMERCIO INTERNACIONAL. Brazil.	Synchronic generator type ATB, with description of its technical specification and spare parts.	October 12, 2005.	November 22, 2005, in customs clearance El Guasaule, Nicaragua.
	August 09, 2005.	Commercial invoice No. 200361. Company UNI-SYSTEMS, INC. Florida, USA.	Partial shipment of a reduction turbo TGM/RENK of counter pressure 25,000 KVA-13.8 KV-60 Hz-including: counter pressure multistage turbine, TGM brand, TME-25000A model, with accessories and spare parts.	August 22, 2005. Santos, Brazil.	Septiembre 28, 2005, in customs clearance El Guasaule, Nicaragua.

	August 09, 2005.	Commercial invoice No. 200362. Company UNI-SYSTEMS, INC. Florida, USA.	Partial shipment of a reduction turbo TGM/RENK of counter pressure 25,000 KVA-13.8 KV-60 Hz-including: velocity reduction device, RENK-ZANINI brand, TA 71n type 22,8 MW 5985/1800 RMP with accessories.	August 22, 2005. Santos, Brazil.	Septiembre 28, 2005, in customs clearance El Guasaule, Nicaragua.