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 NO 945 748 931 MVA

Your ref.:

Our ref.:
 MLEH

Date:
 24 May 2007

Validation opinion

Request for revision of monitoring plans in accordance with paragraph 57 of the modalities and procedures for the CDM

We refer to the procedure for revising monitoring plans adopted at EB 26 and paragraph 85 of the EB 31 report concerning project activities 0150 and 0163: "... The Board further agreed to instruct the DOE and project participant that, should they wish to apply an approved deviation to a registered monitoring plan for future monitoring periods, they should submit a request for revision of the monitoring plan."

We herewith request a revision of the monitoring plan for project activities 0150 and 0163 and several other projects by the same project participant (Please refer to the list of projects in the request for revision of monitoring plan by the project participant – Annex I).

The revision is related to the monitoring of the electricity use of project equipment which is used to determine leakage. The monitoring plan of the projects in question states that electricity consumed by project activity equipment should be measured (m). The project participants initially compared the farm's monthly power bills to determine leakage. However, it became clear that an accurate determination of the power consumed by the individual equipment could not be discerned using this method and was not, therefore, a reliable means for determining equipment leakage. Further, it was considered impractical to install individual watt-hour meters in-line with each motor when the average leakage was a mere ton or two CO₂e per farm site.

The objective of the proposed revision is to also allow the calculation of the electricity use, in addition to measuring the electricity use. If the electricity consumed is calculated, one shall assume that all relevant electrical equipment operates at full rated capacity, plus 10% to account for distribution losses, for 8760 hours per annum.

This alternative approach to determine the electricity use of project was approved by the CDM Executive Board for all projects in questions through approving requests for deviations / requests to apply approved requests for deviations.

(a) the proposed revision of the monitoring plan ensures that the level of accuracy or completeness in the monitoring and verification process is not reduced as a result of the revisions

It appears that leakage determined using calculations, as specified in the revised monitoring plan, is more conservative than if watt-meters were installed in-line with project activity equipment.

(b) the proposed revision of the monitoring plan is in accordance with the approved monitoring methodology applicable to the project activity

The approved monitoring methodology AM0016 does not allow for the calculation of electricity consumption. However, the calculation of the electricity consumption has been approved by the CDM Executive Board for all projects in question through approving requests for deviations / requests to apply approved requests for deviations.

(c) the findings of previous verification reports, if any, have been taken into account

DNV's verification activities for the project in question revealed that measuring of the electricity use of the project equipment is not feasible and that calculating the electricity use is conservative when applying the assumptions stipulated and approved by the CDM Executive Board for calculating electricity use.

Yours faithfully
for DET NORSKE VERITAS CERTIFICATION AS

A handwritten signature in blue ink that reads "Michael Lehmann".

Michael Lehmann
Technical Director
International Climate Change Services

Annex I

Request for Revision of Monitoring Plan by the Project Participant



May 24, 2007

Michael Lehmann
Det Norske Veritas Certification AS
Veritasveien 1,
1322 HØVIK, Norway

RE: Request for Revision of Monitoring Plan

Dear Mr. Lehmann,

In accordance with procedures defined in "*Clarification for Project participants on when to request a revision, clarification to an approved methodology or deviation* (Version 02)," please forward to the Chair, Methodology Panel the attached proposed revision of the monitoring plan related to the project activities listed in Attachment 1.

As noted in Attachment 2, this request incorporates to paragraph D.2.3, Treatment of leakage in the monitoring plan, additional guidance (highlighted text) on how to calculate electrical leakage produced as a result of the project activity. This process was approved by the CDM EB via a Request for Deviation for each project activity listed. The link to the CDM EB decision related to each project activity's corresponding Request for Deviation is listed in attachment 1.

Please feel free to contact me should you require additional information.

Sincerely,

Leo Perkowski
Vice President, Regulatory Affairs

Attachment 1

Project Activities Affected by this Request and Corresponding CDM EB Deviation Approval.

Project Activity Registration Number and Title	EB Decision
0053: AWMS GHG Mitigation Project MX05-B-16, Sinaloa and Sonora, México	Approved RFD
0057: AWMS GHG Mitigation Project MX05-B-17, Jalisco, México	Approved RFD
0104: AWMS GHG Mitigation Project, MX05-B-01, México	Approved RFD
0105: AWMS GHG Mitigation Project, MX05-B-02, Sonora, México	Approved RFD
0108: Granja Becker GHG Mitigation Project	Approved RFD
0120: AWMS GHG Mitigation Project MX05-B-03, Sonora, Mexico	Approved RFD
0150: AWMS GHG Mitigation Project, MX05-B-07, Sonora, México	Approved RFD
0161: AWMS GHG Mitigation Project, MX05-B-05, Jalisco, México	Approved RFD
0162: AWMS GHG Mitigation Project, MX05-B-06, Jalisco, México	Approved RFD
0163: AWMS GHG Mitigation Project, MX05-B-09, Nuevo León, México	Approved RFD
0196: AWMS GHG Mitigation Project, MX05-B-04, Jalisco, México	Approved RFD
0197: AWMS GHG Mitigation Project, MX05-B-10, Aguascalientes, Guanajuato and Queretaro, México	Approved RFD
0204: AWMS GHG Mitigation Project, MX05-B-12, Sonora, México	Approved RFD
0225: AWMS GHG Mitigation Project, MX05-B-08, Sonora, México	Approved RFD
0240: AWMS GHG Mitigation Project, MX05-B-13, Sonora, México	Approved RFD
0257: AWMS GHG Mitigation Project, MX05-B-14, Jalisco, México	Approved RFD
0324: AWMS GHG Mitigation Project, MX05-B-15, Sonora, México	Approved RFD
0335: AWMS GHG Mitigation Project BR05-B-01, Minas Gerais, Brazil	Approved RFD
0336: AWMS GHG Mitigation Project BR05-B-03, Brazil	Approved RFD
0337: AWMS GHG Mitigation Project BR05-B-07, Mato Grosso, Minas Gerais and Goiás, Brazil.	Approved RFD
0364: AWMS GHG Mitigation Project BR05-B-02, Minas Gerais and São Paulo, Brazil	Approved RFD
0365: AWMS GHG Mitigation Project BR05-B-09, Brazil	Approved RFD
0409: AWMS GHG Mitigation Project BR05-B-06, Bahia, Brazil	Approved RFD
0411: AWMS GHG Mitigation Project BR05-B-04, Paraná, Santa Catarina, and Rio Grande do Sul, Brazil	Approved RFD
0412: AWMS GHG Mitigation Project BR05-B-05, Minas Gerais and São Paulo, Brazil	Approved RFD
0413: AWMS GHG Mitigation Project, MX06-B-18, Sinaloa, México	Approved RFD
0417: AWMS GHG Mitigation Project BR05-B-10, Minas Gerais, Goias, Mato Grosso, and Mato Grosso do Sul - Brazil	Approved RFD
0418: AWMS GHG Mitigation Project BR05-B-11, Mato Grosso, Minas Gerais and São Paulo, Brazil	Approved RFD
0419: AWMS GHG Mitigation Project BR05-B-13, Goiás and Minas Gerais, Brazil	Approved RFD
0420: AWMS GHG Mitigation Project BR05-B-14, Espírito Santo, Minas Gerais and São Paulo, Brazil	Approved RFD
0421: AWMS GHG Mitigation Project BR05-B-15, Paraná, Santa Catarina, and Rio Grande do Sul, Brazil	Approved RFD
0422: AWMS GHG Mitigation Project BR05-B-16, Bahia, Goiás, Mato Grosso, Minas Gerais, Rio de Janeiro and São Paulo, Brazil	Approved RFD
0428: AWMS GHG Mitigation Project MX06-B-19, Sonora, México	Approved RFD
0462: AWMS GHG Mitigation Project MX06-B-31, Nuevo León and Tamaulipas, México	Approved RFD
0464: AWMS GHG Mitigation Project MX06-B-33, Jalisco and San Luis Potosí México	Approved RFD
0466: AWMS GHG Mitigation Project BR05-B-08, Paraná and Rio Grande do Sul, Brazil	Approved RFD
0467: AWMS GHG Mitigation Project BR05-B-17, Espírito Santo, Mato Grosso, Mato Grosso do Sul, and Minas Gerais, Brazil	Approved RFD
0472: AWMS GHG Mitigation Project BR05-B-12, Mato Grosso, Mato Grosso do Sul, Minas Gerais, and Sao Paulo, Brazil	Approved RFD

Attachment 2
Excerpt of Monitoring Plan Related to Project Activity Leakage

D.2.3 Treatment of leakage in the monitoring plan:

D.2.3.1 If applicable, please describe the data and information that will be collected in order to monitor leakage effects of the project activity:

ID number	Data variable	Source of data	Data unit	Measured (m), calculated (c) or estimated (e)	Recording frequency	Proportion of data to be monitored	How will the data be archived? (electronic/ paper)	Comment
16. EP _y	Electricity	Power	kWh	m or c	Monthly	100%	electronic	Electricity used for project equipment. If calculated, assume that all relevant electrical equipment operates at full rated capacity, plus 10% to account for distribution losses, for 8760 hours per annum.
19. EP _p	Electricity	Power	kWh	m	Monthly	100%	electronic	Electricity produced through co generation of the captured methane