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## CDM Executive Board

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## Request for review

Dear Sirs,

Please find below the response to the request for review formulated for the CDM project with the registration number 0492. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Javier Castro  
Carbon Management Service

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## **Response to the CDM Executive Board**

### **Issue 1:**

The monitoring plan states that the CO<sub>2</sub> emission coefficient of fuel for the calculation of CO<sub>2</sub> emission factor of the grid is yearly estimated and the validation report (p18) stated that “The grid emission factor is transparently calculated based on the latest available information and will be calculated ex-post during the crediting period.” However, the verification report states that “the external grid emission factor has been fixed ex-ante” and the monitoring report (p5) stated that “the option to calculate the emission factor ex-ante was chosen.” Further clarification is required.

#### **Response by TÜV SÜD:**

The parameter CO<sub>2</sub> emission coefficient of fuel is included in the PDD in chapter D.3. Data is to be monitored and should be updated if changes in the IPCC or national values change. In PDD (see page 12 and 20) the project proponent follows the idea of the ex-ante fixed value for the emission factor of the grid. As such has been used during the first verification of the project activity, when the ex-ante approach was also used for the calculations. The DOE and the Project Participant agree to submit a Revision of the Monitoring Plan before the next EB meeting of November 26-28 that correctly present the ex-ante approach. Following the approach taken during the first verification, the revision should clearly state that the ex-ante fixed emission factor is chosen for the project activity emission reduction calculation.

#### **Response by Project Participant:**

The Project Participant has agreed with the DOE on conducting a Revision of the Monitoring Plan in order to clear up the inconsistency caused by the fact that the COEFi was included in the section D.3 “Data to be monitored”, since this parameter has no influence to the project Emission Reductions provided that the Emission Factor has been calculated ex-ante.

The PP and the DOE agreed on submitting the reviewed Monitoring Plan to the EB before its 44th meeting.

The project participant would like to emphasize that the only intention for the Grid Emission Factor (GEF) at the time the PDD was written, was to follow the ex-ante approach.

The fact that the Validation Report states that “the EF will be transparently calculated ex-post” was obviously a mistake as it was never intended so. This argumentation can be supported with the following statements extracted from the PDD:

- In the page 12:

“...for the calculation of the CO<sub>2</sub> emission factor of the grid, the amount of each fossil fuel consumed by each power plant, the electricity supplied to the grid by each power plant and the CO<sub>2</sub> emission coefficient of each fuel type used are recorded once during project implementation or base on historic data...”

- In the table 5, page 20:

The GEF taken into the account for the ER calculations has been clearly included as the same for the whole first crediting period.

- In the section D.3 “Data to be Monitored”:

The GEF has not been included in the PDD as a parameter to be monitored, and therefore, nowhere in the PDD was mentioned that the Grid Emission Factor would be calculated ex-post.

In addition to that, the first Periodic Verification was conducted satisfactorily according to the ex-ante approach.

**Issue 2:**

The monitoring plan requires the double-check of electricity delivered to the grid by receipt of sales. However, neither the verification report nor the monitoring report contains the information on the double-check. Further information is required.

**Response by TÜV SÜD:**

Double check of the electricity receipts was done by the audit team during the verification process. All invoices have been delivered and are available to the audit team. Unfortunately the information regarding check was not included in the Verification Report and will be submitted with the revised documents.

**Response by Project Participant:**

The invoices have been made available to the DOE accordingly.