0491 Rudong County Wind Farm Project – China

EB comments:

"The DOE is requested to clarify how it has verified that:

1. The baseline emission factor was calculated yearly as mentioned in section D.2.2 of the PDD.

2. The requirement of the monitoring plan for conducting the calibration of electricity meters every six months was met."

Response to comment 1:

In the process of validation, TUV SUD(the validation DOE of the project), in consideration of the ex-ante approach in the PDD, has raised a Corrective Action Request (CAR4) to ask the project proponent to mark those data used for calculation of the grid factor as "*not applicable*" in the table D.2.2.1 of the PDD. And as described in section 4.3.1 of the final validation report, TUV SUD further confirmed that ex-ante determination of the grid factor (910 tCO_2e/GWh) has been chosen for the project.

Therefore, it is very clear that the real intention of the project participants is that the baseline emission factor of the grid should be determined ex-ante, which has been certified by TUV SUD.

On the other hand, according to the *Notification on Determining Baseline Emission Factors of China Power Grid*[1] issued by Chinese DNA in Jul. 2008, the emission factor of East China Grid is 0.92255 tCO_2e/MWh[2] which is the latest ex-post value and larger than the ex ante grid factor (910 tCO_2e/GWh). We considered that the adoption of ex ante grid factor (910tCO_2e/GWh) for calculation of emission reductions is in consistent with the principle of conservativeness.

Therefore, the ex ante determined grid factor (910 tCO_2e/GWh) was used to calculate emission reductions in the monitoring report.

Response to comment 2:

This monitoring period is from Nov. 6th, 2006 to Dec. 31st, 2007. However, the test-run of the first turbine was on Dec. 29th, 2006 and the electricity exported to the grid was from Jan. 20th, 2007.

Jiangsu Metering Testing Center (the qualified calibration institute by Jiangsu Bureau of Quality and Technical Supervision, hereafter referred to as JMTC) was contracted

[1] http://cdm.ccchina.gov.cn/web/NewsInfo.asp?NewsId=2876

[2] $CMex\text{-}post$ = 0.75*$OMex\text{-}post$ + 0.25*$BMex\text{-}post$ = 0.75*0.95556 + 0.25*0.8154 = 0.92255 tCO_2e/MWh

by both of the Grid Company and Jiangsu Unipower to conduct the calibration work to the electricity meters of the Project. According to *Technical Norm of the Calibration of AC Watt-hour Meters at Place of Installation* (JJF1055-1997), the on-site calibration activity mainly consists of General Examination, Error Correction, Raccordement Check, Potential Transformer Secondary Circuit Voltage Drop Test and Timing Error Check. After finishing those works properly, both Jiangsu Unipower and JMTC will sign on the calibration record. And then JMTC will issue a calibration Report to Jiangsu Unipower based on the corresponding calibration record with the same series number.

In Sep. 2005, JMTC carried out the verification after installation of the main meter (Series No. 85093993) and backup meter (Series No. 85440140) in the project, which can be evidenced by the Testing Report (No.JL-DX-2005-4075).

In Jan. 2007, the electricity meters in the project site received the first calibration conducted by JMTC, which can be evidenced by the Calibration Report (No. JL-GK-2007-1008) dated Jan. 18th, 2007.

On Jul. 4th, 2007, to fully implement the monitoring plan Jiangsu Unipower entrusted JMTC to conduct an additional calibration test to the electricity meters on-site, which can be evidenced by the Calibration Record (No.JL-GK-2007-3008). And four months later, Jiangsu Unipower received the Calibration Report with the same series number (No.JL-GK-2007-3008) but dated Nov. 9th, 2007 from JMTC. To clarify this calibration activity of the electricity meters of the project, JMTC provided a written explanation during DNV's verification. The explanation confirmed that JMTC carried out the calibration to the electricity meters in the project on Jul. 4th, 2007 and that those calibrated meters in the project were certified as the accuracy of 0.2%. Furthermore, as the buyer for the power from this project, Jiangsu Power Grid Nantong Power Supply Company assigned representative to participate and supervise this calibration activity. And the calibration management of Jiangsu Unipower Wind Power Co., Ltd was recognized as one of the representative cases in 2007 summary report.

In addition, the electricity meters of the project received another calibration by JMTC, which is evidenced by the Calibration Report (No. JL-GK-2007-1065) dated Jan. 1st, 2008.

In conclusion, the calibration activities of the electricity meters in the project are in compliance with the monitoring plan in PDD and with the testing and calibration regulations in PPA in the first monitoring period.