



Mr. Hans Jurgen Stehr
Chair, CDM Executive Board
UNFCCC Secretariat
CDMinfo@unfccc.int

September 4th 2007

Re Request for clarifications for issuance of the CER for "Deoband Bagasse based Co-generation Power Project" (Ref. no. 0578) for the monitoring period from 01 Nov 2004 to 31 March 2007

Dear Mr. Stehr,

SGS has been informed that the request for issuance for the CDM project activity "Deoband Bagasse based Co-generation Power Project" (Ref. no. 0578) for the monitoring period 01 Nov 2004 to 31 March 2007 is under consideration for review because three requests for review have been received from members of the Board.

The requests for review are based on the same reasons outlined below and read. SGS would like to provide a response to the issue raised by the review team:

Request for clarification to the DOE/PP:

1. The monitoring report and the spreadsheet do not present the data on the temperature and pressure of steam, while the monitoring plan and the methodology requires that these parameters be monitored in a continuous basis.

SGS Reply:

The registered monitoring plan and approved methodology specified monitoring of steam temperature and pressure only for measurement of net quantity of heat generated from project plant. The monitoring procedure at the plant site includes continuous monitoring of steam temperature and pressure. This data is then recorded on hourly basis in the Distributed Control System (DCS) and reported daily to the head of the Cogeneration plant. The monthly average figures for temperature and pressure of steam has now been incorporated in the revised monitoring report (Annex 01). Random sample of the reports were checked during site visit.

2. The electricity generation by the project in March 2006 and January 2007 exceeded the maximum theoretical generating capacity of the plant (22.0 MW). Likewise the steam generated in January 2007 was higher than the maximum capacity of 120 TPH. Clarification is required.

SGS Reply:

The project activity comprises of an extraction cum condensing turbo generator of nominal capacity 22 MW and a high pressure boiler of 87 Kg/Cm² and 120 TPH steam generation capacity. Since the sugar

manufacturing business is seasonal and the cane crushing varies depending upon the availability of the cane, therefore the steam requirement for sugar manufacturing operations fluctuates, this fluctuation results in variation in process steam withdrawal, which is extracted from the project cogeneration plant. In order to take care of these variations the turbine has been designed for a condition called valve wide open condition, wherein the flow in turbine can vary 3-5 % more than Maximum Continuous Rating (MCR) turbine flow, which eventually results in more power generations. It is to be noted that generation figure during the sugar manufacturing season for the month of March 2006 is 100.257 % of the rated value, whereas in case of January 2007 the generation figure is 101.014 % of the rated value.

It has also been observed that steam generation for the month of January 2007 is 100.132 % of the guaranteed generation value. Since January is a seasonal month for sugar operations, the higher quantity of steam is attributed to higher fuel firing and thus a marginal increase in steam flow above guaranteed value of 120 TPH. The actual heat and power generation from the project activity was verified during site visit. The daily generation for March 2006 and January 2007 is attached as Annex 02.

Avant-Garde Engineers and Consultants were the project design consultants for Deoband cogeneration project activity and they have provided a technical explanation on condition of overloading operations for project turbine and boiler which has been enclosed (Annex 03).

Therefore, we feel that the clarification sought by board members has been taken into account. We do however apologize if this was not sufficiently clear from the earlier verification and certification report.

Sanjeev Kumar (0091 9871794628) will be the contact person for the review process and is available to address questions from the Board during the consideration of the review in case the Executive Board wishes.

Yours sincerely

Irma Lubrecht
Technical Reviewer
Irma.lubrecht@sgs.com
T: +31 181 693293
M: +31 651 851777

Shivananda Shetty
Lead Auditor
Shivananda.shety@sgs.com
T: + 91 124 2399990 - 98
M: + 91 9871794706

Annex 1 Revised Monitoring Report
Annex 2 Daily generation detail for March 2006 and January 2007
Annex 3 Letter from Project Consultant

- o00 -