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TÜV SÜD Industrie Service GmbH · 80684 München · Germany

## CDM Executive Board

Your reference/letter of	Our reference/name	Tel. extension/E-mail	Fax extension	Date/Document	Page
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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 0898. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Werner Betzenbichler  
Carbon Management Service

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

### **Issue 1:**

There appears to be some inconsistency in the calculation of operating margin emission factor (OM EF) in Annex 3 of the PDD and the formula provided for calculation of OM EF in Page 15 of the PDD. Equation (6) in Page 15 appropriately incorporates imported electricity while calculating the OM EF. However, in Annex 3, this formula has not been implemented. Although the average OM EF of imported electricity from CCPN has been calculated (0.741tCO<sub>2</sub>/MWh), it has not been incorporated in the calculation of the OM EF and thereby to the combined margin emission factor. This should be corrected.

### **Response by TÜV SÜD:**

The project developer has added a justification why the average OM EF of the imported electricity from CCPN has not been incorporated into the calculation of the combined margin emission factor. He has done so due to the conservativeness principle. By incorporating the average OM EF of the imported electricity from CCPN the grid factor and the emission reduction will increase by more than 1 000 tons per year. According to the methodology ACM0002 version 6 the option a) regarding the project boundary can be used and the emission factor from the net electricity imports from a connected electricity system can be regarded as 0. We agree to this justification and assume this calculation to be more conservative than the correction of the calculation. As the calculation of the combined margin emission factor has to be repeated ex-post according to the methodology there will be a new calculation for the issuance of CER.