

Response to request for review for "Demand side energy efficiency projects at RIL-PG" (0956)

Comment:

Although the selected baseline methodology is in line with the Small-scale CDM project activity category approved by the EB "Category: II.D. Energy Efficiency and fuel switching measures for industrial facilities" version 7, the Excel file showing the calculations did not use the emission factor of 0.794 tons CO₂/MWh (cell D35). Instead the value of 0.859 (and 0.879 tons CO₂/MWh from date 4/1/06 onwards) was used in computations of emissions reductions in both Measures I and II. PP and DOE do not give the source of the various emission factors or explain the reason for the change.

The DOE did not realize this point.

Further clarification is needed on this issue and recalculation might be needed (although the emission factor used is higher and therefore the project will result in fewer emissions reductions).

Response by project proponent:

The emission factor (EF) is calculated from actual fuel consumption in Captive Power Plant. The fuel consumption is monitored monthly and average emission factor for the year is used to calculate annual emission reduction.

Emission factor calculation in first sheet (i.e. 0.794 tons CO₂/MWh) is only a representative sample calculation provided to elaborate the procedure used for EF estimation. The EF will change slightly over months depending upon fuel mix in CPP.

EF of 0.859 t CO₂/MWh is average for year Apr'05 – Mar' 06 and EF of 0.879 t CO₂/MWh is for next financial year till the PDD was made i.e. from Apr'06 to Sep'06. We have included the calculations for these values in the Excel sheets.

Response by TÜV SÜD:

RIL PG operates a captive power plant. In accordance with methodology II D. - which refers to I.D. - the emission factor for captive power generation will be calculated ex-post based on the weighted average emissions of the current captive power generation. The actual monitored data will be used for calculating the annual emission factor (ex-post) and the actual emission reductions. Respective monitoring parameters have been included in the monitoring plan. The calculation of the emission factor (0.794 tons CO₂/MWh) in the first sheet of the Excel file is only a sample calculation – the only purpose of this sample calculation is to demonstrate how the baseline emission factor will be calculated ex-post. These formulae have been verified by the audit team.

For the purpose of emission reduction projections, the calculations are based on monitored data from 09/22/05 – 09/21/06. For the period 09/22/05 – 03/31/06, an emission factor of EF = 0.859 kg CO_{2e}/kWh - calculated based on the monitored data of the financial year April 05-March 06 - has been applied. From 04/01/06 onwards, an emission factor of EF = 0.879 kg CO_{2e}/kWh – calculated based on data from April 06 to September 06 – has been used.



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The revised Excel file still includes the sample calculation on sheet 1, but the calculation of $EF = 0.859 \text{ kg CO}_{2e}/\text{kWh}$ (05/06) and $EF (04.06-09.06) = 0.879 \text{ kg CO}_{2e}/\text{kWh}$ has also been included to further clarify the issue.