



CDM project activity registration review form (F-CDM-RR)
(By submitting this form, a Party involved (through the designated national authority) or an Executive Board member may request that a review is undertaken)

Designated national authority/Executive Board member submitting this form	
Title of the proposed CDM project activity submitted for registration	The Wulabo 30 MW Wind-Farm Project in Urumqi, Xinjiang of China; Project activity 1244

Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures, which validation requirement(s) may require review. A list of requirements is provided below. Please provide reasons in support of the request for review, including any supporting documentation.

☐ *The following are requirements derived from paragraph 37 of the CDM modalities and procedures:*

- ☐ The participation requirements as set out in paragraphs 28 to 30 of the CDM modalities and procedures are satisfied;
- ☐ Comments by local stakeholders have been invited, a summary of the comments received has been provided, and a report to the designated operational entity (DOE) on how due account was taken of any comments has been received;
- ☐ Project participants have submitted to the DOE documentation on the analysis of the environmental impacts of the project activity, including transboundary impacts and, if those impacts are considered significant by the project participants or the host Party, have undertaken an environmental impact assessment in accordance with procedures as required by the host Party;
- ☒ The project activity is expected to result in a reduction in anthropogenic emissions by sources of greenhouse gases that are additional to any that would occur in the absence of the proposed project activity, in accordance with paragraphs 43 to 52 of the CDM modalities and procedures;
- ☒ The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board;
- ☐ Provisions for monitoring, verification and reporting are in accordance with decision 17/CP.7, the CDM modalities and procedures and relevant decisions of the COP/MOP;
- ☐ The project activity conforms to all other requirements for CDM project activities in decision 17/CP.7, the CDM modalities and procedures and relevant decisions by the COP/MOP and the Executive Board.

☐ *The following are requirements derived from paragraph 40 of the CDM modalities and procedures:*

- ☐ The DOE shall, prior to the submission of the validation report to the Executive Board, have received from the project participants written approval of voluntary participation from the designated national authority of each Party involved, including confirmation by the host Party that the project activity assists it in achieving sustainable development;
- ☐ In accordance with provisions on confidentiality contained in paragraph 27 (h) of the CDM modalities and procedures, the DOE shall make publicly available the project design document;
- ☐ The DOE shall receive, within 30 days, comments on the validation requirements from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available;
- ☐ After the deadline for receipt of comments, the DOE shall make a determination as to whether, on the basis of the information provided and taking into account the comments received, the project activity should be validated;
- ☐ The DOE shall inform project participants of its determination on the validation of the project activity. Notification to the project participants will include confirmation of validation and the date of submission of the validation report to the Executive Board;
- ☐ The DOE shall submit to the Executive Board, if it determines the proposed project activity to be valid, a request for registration in the form of a validation report including the project design document, the written approval of the host Party and an explanation of how it has taken due account of comments received.

☐ There are only minor issues which should be addressed by the DOEs prior to the registration of the project.

Section below to be filled in by UNFCCC secretariat

Date received at UNFCCC secretariat	26/09/2007
-------------------------------------	------------

Reason for request:

- Further demonstration of the additionality of the project activity is required.
- The PP/DOE shall further clarify if the "temporary regulation to the small scale thermal-fired power station" issued by the former Ministry of Electric Power Industry, 1997" is still enforceable given its temporary nature and the fact that it is a regulation established in 1997. As this is the regulatory framework that makes thermal fired power plants not a valid alternative the PP/DOE shall further substantiate the selection of the project alternative.



3. The DOE shall further clarify how they have validated that the “Interim Measures for Economic Evaluation on Electric Power Technical Reconstruction Project”, issued by State Power Corporation, dated on Sept. 10th, 2002, Document No. GuoDianFa[2002]623, apply to this project, taking into account that the project activity is a new facility.
4. The PP shall further clarify the reference to “the price volatility, fluctuating exchange rate and other uncertainties/risks, this project is practically not feasible to potential investors” in page 11 of 53 of the PDD.
5. The PP shall further clarify their statement in page 12 of 53 of the PDD that the “possibility of rising in the bus-bar electricity tariff and reducing in the total investments does almost not exist, considering that the electricity tariff for connecting to the power grid was approved by the NDRC, fixed at the current level and the trends of price rising for raw materials and equipments” as against their reference to volatility of prices. Does volatility of prices exclude tariffs? Is it possible to have prices continuously rising and tariffs fixed for the next 21 years? In addition the DOE shall clarify how they have validated the sensitivity analysis and the underlying assumptions as well as the feasibility study.
6. The following technology barrier statement -used as a demonstration of current barriers- “the Wulabo wind farm project will adopt the 1.5MW FD70B-1500/13 turbines which are manufactured domestically by Dongfang turbine factory by using imported advanced technologies. Although there are operation records already for such products, the capability of long time continuous operation by such domestically manufactured equipment is lack to be proven against real operation practice under atrocious weather environment, especially in the Gobi Desert area in the northwest part of China” as stated in page 13 of 53 of the PDD is completely contradictory with the DOE Validation Protocol (page 17 of 53 of the Validation report) that states that “In this project, 20 turbines with capacity of 1,500 kW each are planed to be installed. The supplier, Dongfang Steam Turbine Company, is one of the biggest Chinese wind turbines manufacturer. With the technology introduced by German Repower, Dongfang has successfully developed and implemented 1,500 kW turbines at wind power plants, such as, Shandong Rongcheng, Guohua Hulunbeier, etc.. There's no doubt that the project activity reflect current good practices”. The DOE shall further clarify how they have validated these technology barriers and whether they are real and verifiable.
7. The DOE shall further clarify how they have validated the common practice analysis and its consistency.
8. As it is unclear if the net electricity generated is measured or calculated, further clarification is required as to whether the monitoring plan is in accordance with the methodology.