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Response to Request for Review

Dear Sirs

Please find below the response to the request for review formulated for the CDM project with the registration number 1908. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Javier Castro
Carbon Management Service

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Response to the CDM Executive Board

Request for Review

Issue:

The DOE is requested to provide details regarding how it has been confirmed that the emission factor calculation complies with the requirements of the approved methodology and applicable tools. In doing so the methodological choices made and the correctness of these choices should be described. The DOE may wish to take note of the guidance provided by the Executive Board on this matter (EB43, para 64 (a)).

Response by TÜEV SÜD:

According to chapter 3 (History of the validation process) in the validation report, which was submitted for request for registration to the Executive Board on July 01, 2008 and published on September 23, 2008 at the UNFCCC web site https://cdm.unfccc.int/Projects/request_reg.html , the GSP process was repeated from September 01, 2007 to September 30, 2007 for the given project activity, applying version 6 of ACM0001 and version 6 of ACM0002. The latter methodology was valid from May 19, 2006 to December 13, 2007 and requests for registration could be submitted until August 13, 2008. The project was submitted for registration on July 01, 2008, thus clearly prior to the deadline date as well as prior to EB43. Both methodologies (ACM0001, version 6 and ACM0002, version 6) were still valid at that time. ACM0002 version 6 does not mention the use of the "Tool to calculate the emission factor for an electricity system" at all.

The validation report, which was submitted to the EB, clearly mentions in the chapter "Monitoring" that the emissions factor is determined ex-ante and that it is based on publicly available data from the Brazilian National Dispatch Centre ONS from 2004 to 2006. Besides, the validation report mentions that the emissions factor of 0.2826 tCO₂/MWh has been calculated by the most important project developers in Brazil. Furthermore, it is mentioned that the emissions factor calculation sheet (see annexed) was submitted to the validation team and no errors were detected when it was verified.

TÜEV SÜD confirms with this response to the Request for Review once more, that the emissions factor calculation was verified and that the applied emissions factor of 0.2826 tCO₂/MWh for the South-Southeast-Midwest system is correct and appropriate. Annex 3 of the final PDD submitted for registry clearly mentions in Annex 3 the methodological choices made and the correctness of these choices is confirmed by TÜEV SÜD. The methodological choices are correctly applied as according to the methodology ACM0002, version 6.

The Brazilian DNA released a resolution defining the Brazilian Electricity System as a single interconnected system on May 26, 2008, however only valid for projects whose GSP was started on **July 19, 2008** or afterwards. July 19, 2008 was the date, when it was published in the "Diário Oficial da União" (Official gazette of the Federal Executive). Before the Brazilian Interconnected System was subdivided in 2 subsystems (South-Southeast-Midwest and North-Northeast) and accepted by the Brazilian DNA for this given project activity as well as in many other projects up to July 18, 2008.