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Date: July 5, 2012
Ref. No.: JCI-CDM-C-12-018

CDM Executive Board
c/o Secretary to the CDM Executive Board

Subject: Response to Request for Registration Incomplete for “Waste Heat Recovery Power Plant in PT. Semen Padang, Indonesia” · Ref No.00005603

Dear Sirs,

Please find the attached documents which show the responses from the PP and JCI to the Request for Registration Incomplete for the captioned CDM project / Reference No.5603.

If you have any further question or request, please let us know.

Yours sincerely,

[Signature]
Hideyuki Sato

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Response to Request for Registration Incomplete

Project title: Waste Heat Recovery Power Plant in PT. Semen Padang, Indonesia
Reference No.: 00005603
Project Participants: (1) PT Semen Padang (Hereafter referred as “PTSP”)
(2) New Energy and Industrial Technology Development Organization (NEDO) (Japan)
(CDM consultant: JFE Engineering Corporation (Japan))
DOE: Japan Consulting Institute, JCI

Issue 1:

The PP/DOE are requested to include the details of each parameter listed as per EB 48 Annex 60 paragraph 10 (a).

Page 16 of the PDD states the value of $Q_{OE, BL}$ as 58,032 MWh whereas the other sections states the value of $Q_{OE, BL}$ as 63,240 MWh. The PP is requested to correct the inconsistencies in the PDD.

Response from the PP and JCI:
The value of $Q_{OE, BL}$ as 58,032 MWh in Page 16 of the PDD was corrected to 63,240MWh in revised PDD/1/ by the PP and JCI has confirmed that it is appropriate for the consistency in the PDD/1/.

Issue 2:

The PP/DOE are requested to include the details of each monitoring parameter listed as per EB 48 Annex 60 paragraph 10 (a).

The PDD (Page 30) states that the quantity of gross electricity generation by waste heat will be measured by energy meter of accuracy class 1.5%. The DOE is requested to provide further information on how it validated that this is in accordance with para 17 (c) of EB 61 Annex 21 which states that measuring equipment should be certified to national or IEC standards.

Response from the PP and JCI:
The PP confirmed that there is no standard or regulation in Indonesia that can be applied to meters for captive power plant like a case in Cement plant of PT Semen Padang through the interview with governmental official expert in Electronic Business Regulation and Supervision Department of Electricity Business Affairs Supervision Ministry of Energy and Mineral Resources.
Although the “Regulation of the Minister of Energy and Mineral Resources No.37 2008, Power System Network Rules Sumatera” is the standard applicable to electricity meters in Power station Sumatra, however, it is not applicable to the electricity meters that are installed to the waste heat recovery power generation system at PT. Semen Padang Indarung plant.
Since the meters for the project will not be used for electricity business trade with Electricity Company, an applicable regulation for such meter is not ruled in Indonesia. Accordingly, the PP will install the electric meters (M-1 and M-2) according to the Japanese Industrial Standards, JIS C1216-2, “Alternating-current watt-hour meters (for connection through instrument transformer) – Part 2: Measuring instruments used in transaction or certification manufacturers” /2/.

The accuracy of meters (M-1 and M-2) is also not defined by the regulation in Indonesia, accordingly “Precision watt-hour meter with 1.0%” will be used for the project according to the JIS C1216-2, and the revised PDD /1/ with the changes to “1.0%” instead of “1.5%” for M-1, and of “0.5%” for M-2 in Section B.7.1 of the PDD /1/ is provided by the PP.

JCI has confirmed that the PP’s approach for the Standards or regulations in Indonesia by hearing the opinion from governmental expert is conducted in appropriate manner. JCI confirmed that the accuracy level (1.0%) of Meter-1 and Meter-2 in the revised PDD /1/ is complied with the JIS C1216-2 /2/, and Validation Report /7/ was revised accordingly. JCI confirmed that the period of validity of 7 years for electronic system of Meter-1 and Meter-2 in the PDD /1/ is complied with “Measurement Act Enforcement Ordinance (Government Ordinance No.329)” /3/, and Validation Report /7/ was revised accordingly.

**Issue 3 i)**:

The DOE is requested to state if all assumptions/data/references used in the PDD for emission reduction calculations are in line with the methodology as per VVM v1.2 paragraph 92(a).

i) The DOE is requested to provide further information on how it validated the emission factor calculation for the Sumatera grid. In doing so the DOE is requested to detail the data sources validated and also submit the emission factor calculation worksheet.

**Response from the PP and JCI**:

JCI provides the active worksheet of Annex 3 /4/ of PDD for the emission factor calculation. The data sources for the each annual emission factor calculation worksheet were added in Annex 3 /4/ (Page 44-46) of the PDD /2/ by the PP and JCI has confirmed that it is appropriately applying the “Southern and Northern Sumatra Electricity Statistics” /5/ and ” Sumatera Grid Power Plant Statistics” /6/.

Since the PP and JCI are requested from the Ministry of Energy and Mineral Resources, Indonesian Government, who is responsible to the above detail data sources, that the detail data sources shall not be publicly available. Accordingly, those data in “Southern and Northern Sumatra Electricity Statistics” /5/ and ”Sumatera Grid Power Plant Statistics” /6/ are submitted by uploading as the confidential documents.
Issue 3 ii):

The DOE is requested to state if all assumptions/data/references used in the PDD for emission reduction calculations are in line with the methodology as per VVM v1.2 paragraph 92(a).

ii) The DOE is requested to remove the inconsistencies in Page 20 and 21 of the Validation report related to "methane recovery component".

Response from JCI:
The inconsistencies in Page 20 and 21 of the Validation Report related to "methane recovery component" have removed and the proper sentence was inserted in the revised Validation Report /7/.

Document list for submission

/1/: PDD version 04, 04/07/2012 (Clean version, Tracking version)
/2/: JIS C 1216-2 Alternating –current watt-hour meters
/3/: Term of validity, Measurement Act Enforcement Ordinance (Government Ordinance No.329)
/4/: Active worksheet of Annex 3 in PDD
/5/: Southern and Northern Sumatra Electricity Statistics [Confidential]
/6/: Sumatera Grid Power Plant Statistics [Confidential]
/7/: Validation Report revision 01, 05/07/2012 (Clean version, Tracking version)