

Dear Sir/Madam,

Subject: Input for the Draft “Tool to determine the Baseline efficiency of thermal or electric energy generation systems”

The Draft suggests following Baseline Methodology Procedures to determine the baseline efficiency of the systems described under section I.

1. Use the manufacturer’s Load efficiency function;
2. Establish a load efficiency function based on measurements and a regression analysis;
3. Establish the efficiency based on historical data and a regression analysis;
4. Use the manufacturer’s efficiency values;
5. Determine the efficiency based on measurements and use a conservative value;
6. Use a default value;

Here in for the option No. 2. It is specified that one have to establish the load efficiency function by conducting efficiency tests on the energy generation systems and applying a regression analysis on the test results. Here methodology seeks an ANOVA table showing the regression and residual sum of squares and significance level SIG and methodology also seeks to run a confirmatory analysis, using Null Hypothesis test to cover total population. Here for ANOVA test the Significance (SIG) of 0.05 and lower has been suggested for the coefficient table. Also a 0.05 value is recommended for (α) i.e. probability for null Hypothesis to assure the statistical significance.

Though all the quality procedures are specified here but the desired value of residual sum of squares (R^2) for regression analysis is not mentioned here. So we suggest that a minimum value of desired R^2 should be mentioned in the tool so that statistical quality of regression analysis could be maintained without creating any confusion.

Also as Residual Sum of Squares (R^2) represents the accuracy of fit therefore by fixing its minimum value on higher side would be a more conservative step in calculating emission reductions.

Best Regards

Harish Sharma
Manager-Development