

Comments to the Public Call „Draft Consolidated methodology for electricity and heat generation from biomass residues”

The author would like to thank the MethPanel for its extensive work on drafting the actual version of a methodology on electricity and heat generation from biomass residues. The author submitted a request for revision on the approved ACM0006 (AM_REV_0169). The goal of the request was to expand the applicability of ACM0006 to situations in which one category of biomass residues represents the main fuel in the baseline, and in which a second category of biomass residues is introduced by the project activity. For the first category the baseline is the utilization for energy purposes, but its availability is limited (baseline B4). For the second category the baseline is the decay in the field.

The proposed activity represented by the request for revision was, besides the introduction of a new second category of biomass residues, also capacity expansion. Capacity expansion would also have occurred in the absence of the proposed project activity but based on existing equipment and on the expense of a lower efficiency and of continuing the use of fossil fuels instead of the introduction of the second category of biomass residues.

Therefore, the comments given in the following are aimed to verify the applicability of the draft methodology to the above proposed project activity. In this context, the definition and monitoring of parameters in situations where the baseline is the implementation of a reference plant at a site where a power plant already exists prior to the project activity shall be verified.

In project activities where the baseline is a reference plant (with different conditions as in the existing plant), a broader wording in terms of monitoring might be appropriate in some instances. For example, LFC(HG,h) is to be determined according to on-site measurements (see definition of parameters, Data 82). In case of reference plants being the baseline, however, on-site measurements are impossible.

The author is not sure about the indexes of $EL(PJ,imp,y)$. Does this parameter refer to the imports in the project activity, or to the imports that would occur in the baseline/reference?

In terms of efficiencies, the draft stipulates that seasonal operational constraints shall be taken into account. Suggestions on how this shall be made would be welcome. The draft allows selecting between three options to determine the efficiencies of heat generators and engines (Step 6). One option is to apply default values. In case of baselines with biomass-based generation, which default values can be applied as these are not provided for in the tool which is referred to? Those of the co-fired fossil-fuel type (e.g. coal), if any? How about fuel mixes?

The author is not sure if the effort to calculate efficiencies for both biomass-based and fossil fuel-based boilers and heat engines separately is compensated by the additional level of detail achieved. This applies especially on heat engine level.

The author understands that in following ACM6 the baseline (e.g. reference plant) can be defined dynamically, i.e. it follows the development that would have happened in the absence of the project activity. This is interpreted from indexing, for example, $BR(B4,n,y)$ with the years y .

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