August 4, 2010

Public inputs on the draft "Consolidated methodology for electricity and heat generation from biomass residues" methodology prepared by the Meth Panel:

1. It might be assumed that electric power-only plant products both of 100% power and 0% heat in a particular point, i.e. the heat-to-power ratio of 0 to 1, and, if appropriate, this draft methodology could be considered to be combined with ACM0006. Too many similar methodologies that are divided by type in much more detail and less differences among them would bring ahout more work over to the Meth Panel experts as well as to the project proponents without any elasticity. For example: Tianba 15MW Small Hydropower Plant (not submitted for registration yet) supply both of the direct user and the grid its generated power with the ratio of 95% and 5% respectively. It has been suitable to the methodology of AMS-I.D/version11 to version15, but now, since EB 53 meeting it updated and divided into two methodologies of AMS-I.D/version16 and AMS-I.F/version 01 neither of which is applicable to the proposed project any more, result in three options remained to coup with the problem: ① submission for deviation; ② AMS-I.F/version 01 applicable to the 95% of the power to the direct user and AMS-I.D/version16 to the 5% of the power to the grid, if applicable; ③ AMS-I.D/version15 available until the date for deadline. Therefore, it is not much necessary to update AMS-I.D/version15 to AMS-I.D/version16 and AMS-I.F/version 01 which have no so much distinction to be put into two methodologies.
2. As the draft methodology states on page 4: *(5) No significant energy quantities, except from transportation or mechanical treatment of the biomass residues, are required to prepare the biomass residues for fuel combustion, i.e. project that process the biomass residues prior to combustion (e.g. esterification of waste oils, gasification, etc.) are not eligible under this methodology;* in which the gasification underlined above shall be defined further and in detail as a first-one-of-its-kind technology, by use of agricultural biomass residues to be converted to processing biogas by the way of gasification to generate power and /or heat and /or some other products ultimately, has started to trail operation in industry capacity in China.
3. For simplification and conservativeness, it is obvious that the CH_4 from uncontrolled burning or decay of surplus biomass residues in baseline, the CO_2 from off-site transportation of biomass residues and the CH_4 from combustion of biomass residues for electricity and heat in project activity in table 1 on page 5 to 6 shall be excluded from emission sources as consideration based on the quite different quantity of surplus biomass residues for uncontrolled burning, the quite different quantity and time of surplus biomass residues for decay under the situation in baseline and project activity and my long time experiences as a farming technician on state farms in China.
4. It shall take a list of H8 to the alternative baseline scenarios for heat on page 8 as the following: *H8 The heat for residence and office building from coal stoves or combination of coal stoves and boilers and some other sources, especially in undeveloped or less developed area and countries.*
5. It shall take a list of B8 to the alternative baseline scenarios for biomass residues on page 10 as the following: *B8 The agricultural biomass residues are required to be treated or processed prior left to decay mainly under aerobic conditions. This applies, for example, to cut the agricultural biomass residues into pieces and then ploughed into the earth.* A

relative information on it might be added in the table 2 on page 11, as appropriate, and some other related addition involved as well.

(Note: this is the first half of comments for the draft document and the second half of it could not be completed since the time limited)

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