Template for comments

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TABLE FOR COMMENTS

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0	1	2	3	4	5	6
#	Para No./ Annex / Figure / Table	Line Number	Type of comment **ge** = general **te** = technical **ed** = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (*to be completed by UNFCCC secretariat*)
1			ge	The variations of the heat load curves and the power load curves are a normal part of cogeneration design work. This variability is part of the reasons why cogeneration policies of the most advanced types, in Germany and in California, struggle to stimulate the potential for cogeneration because recipients for heat and recipients for power do not make the effort to identify a contractual form that allows to link the energy side of their operations. A consolidated methodology could reflect this real and practical problem and help to overcome it. The impressive success of CDM for sugarcane cogeneration in Brazil and India demonstrates that methodologies can actually support the agreement of heat recipients and power recipients. In other words, the calculations defined in the methodology (AM15 and ACM6) are credible as neutral and are helpful for commercial contracts. Before CDM no sugarcane cogeneration facility exported to the grid in Brazil, afterwards it is the standard solution. I believe there is no inherent reason why the usability of the biomass cogeneration methodology should be higher than the usability of the natural gas cogeneration methodology. The limited use of AM14 and AM48 is due to unrealistic elements motivated by excessive caution.		
2	para 2 (a), (b)		ge	"no emission reduction can be claimed for the excess power (excess heat) supplied to the grid (heat network)". These two applicability conditions seem to be excessive limitations (already in the fourth applicability condition in AM14vs.04). Accounting for the export of excess heat or excess power during different time periods is the essence of enabling cogeneration (also Table 2 in AM48 contains conditions for fuel switches or efficiency changes that are not directly related to cogeneration parameters). Instead, conditions for heat load curves and the overall thermal efficiencies can be formulated that limit the power exported to the grid. Such conditions were used in PURPA in the US and there is abundant evidence how to adapt them.		

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3			**ge**	The Draft Ver05 is a real improvement over Ver04 by allowing different parameters that lead to equivalent results, likely to increase projects reaching verification. Further, leaving out the calculations of methane and nitrous oxide emissions indeed makes the meth more usable without any reduction in accuracy. But none of the changes in Draft Ver05 addresses the core reason for the limited usability of the meth. All AM14 using projects so far take place in industrial sites whose processes run 24h/d throughout the year (fertilizer, plastics, textiles, petrochemicals), (also the reason for their large scale). Because of the complete exclusion of excess heat or power supplied to grids from emission reductions credited, this methodology is limited to industries that are very rare in LDCs or countries with less than 10 CDM projects. Accounting for the export of excess heat or excess power can be limited by requiring that, for example, during 1000 hours per year, the entire heat or power production from the cogeneration units must be used by the PP's facilities and only that much as exports to a (heat or power) grid can be credited for emission reductions during the reminder of the year. Such an applicability condition reflects that heat loads in most industries vary. PPs are enabled to size cogeneration for highest energy efficiency and offer excess heat during off-peak periods. An applicability condition of this sort does not require additional monitoring data just more reporting. It can expand the range of cogeneration projects eligible and does so using quality criteria of cogeneration system designs. Such a 1000 hour condition could furthermore be differentiated between gas turbine, combined cycle and gas engines, or for system sizes (perhaps <5MW, 5-50MW and >50MW).		