

Dear CDM team and Secretariat,

According to the guidance from CDM team, I submit this comments to tell you something for my revision request to the AMS-1.C. responded with SSC-750 by methodology panel on 19th October 2019.

In the response, firstly MP pointed out that PP shall include heat pump in the project boundary.

Regarding this, PP already considered to include heat pump in boundary in the draft PDD to monitor and calculate the emissions from electricity consumption and refrigerant use. And PP only proposed the exclusion of heat pump in capacity counting for the balance to the other reduction types(e.g. biomass).

Second, MP responded that PP should request the new or revision of Type 3 methodology to calculate refrigerant emissions from baseline and project scenarios.

Regarding this, basically river water thermal energy falls under renewable energy and it is definitely classified as renewable energy in the relevant Korean law. And in many projects reducing GHG, the projects may employ more than one technology and include many kinds of mixed emission activities especially using electricity and/or refrigerant.

Further AMS-1.C. has been continuously changed to extend the applicability of the methodology, and eventually the emissions from electricity consumption and refrigerant were included in paragraph 73(the calculation of project emission) of AMS-1.C. version 20 revised on 1 June 2014.

Moreover MP already confirmed and agreed in clarification response of SSC-747 that in principle AMS-1.C. can cover the technologies using river water thermal energy with heat pump and encouraged to submit a draft PDD to revise AMS-1.C. to include the river water thermal energy supply project, and I proposed to calculate the baseline emissions of refrigerant using the same equation of project emissions of refrigerant in the paragraph 33 of draft revision.

So I think that the surface water thermal energy supply project with refrigerant using heat pump can be included in the Type 1 and apply AMS-1.C. and the refrigerant emissions should be calculated not only in project emission but also in baseline emission for the accurate calculation of emission reductions.

Third, MP pointed out that the impacts from the eight potential scenarios are not assessed and included in the proposed request. However the GHG emissions types from the eight scenario activities are the same; electricity and fossil fuel consumption and/or refrigerant use. And PP made and submitted the revision request to include all the types of emission activities.

So, in conclusion, I think that my revision request should be accepted to promote more emission reduction activities by keeping the consistency of MP policy and broadening the applicability of AMS-1.C in accordance with the principles stipulated in the methodology revision procedure CDM-EB70-A36-PROC.

Best Regards,

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