

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	Baseline Methodology Procedure, Step 1, para 1 Page 3/25	1,2,3	te	<i>Identify all power plants (excluding power plants registered as CDM project activities but including power plants requesting registration as CDM project activities or under validation)</i> Justification: It is not clear why project under validation or requesting registration will be included in the baseline assessment considering that the baseline should only include project activities that have not considered CDM benefits. It is for the same reason that such projects are also excluded from the common practice analysis	<i>Identify all power plants (excluding power plants registered or requesting registration or undergoing validation as CDM project activities)</i>	
2	Baseline Methodology Procedure, Step 1, bullet 4, Page 4/25	1	ge	<i>The government permit has not been issued for more than 5 years</i> Justification: Definition of “government permit” is not clear. In any case, it is not clear why projects which have received “government permit” more than 5 years ago should be treated differentially.	Guidance sought from the Meth Panel. Criteria of 5 years should be removed	

Template for comments

Date: 19/04/2012	Document: Draft revision to the approved consolidated baseline and monitoring methodology ACM0013, Version 05.0.0
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3	Baseline Methodology Procedure, Step 3, para 2 Page 4/25	1,2	te	<i>Add up the market shares of each technology one by one from the end of the least efficient technology until the subtotal of market shares reaches 80% in terms of installed generation capacity</i> <u>Justification:</u> Computation of market share based on installed capacity would have been appropriate if power plants of various technologies were available in capacities of similar ranges. However, it is observed across various projects under validation that more efficient technologies are generally available in higher rated capacities than the low efficient technologies. Thus, market share calculation should be based on number of plants rather than installed capacity.	<i>Add up the market shares of each technology one by one from the end of the least efficient technology until the subtotal of market shares reaches 80% in terms of number of planned plants</i>	
4	Data and parameters not monitored: η_{BL} (Any comment) Page 16/25	6,7,8	te	<i>In addition, the adopted value shall not be lower than the minimum efficiency (if available) specified for the respective baseline technology in Appendix I</i> <u>Justification:</u> Feasibility reports are decided for the management to make the investment decision. Why should any other default value be included in this assessment?	Should be removed from the draft of the methodology	
5	Appendix 1 Page 24/25	Row 3,4	te	<i>Subcritical technology – Minimum value of efficiency for subcritical technology will be 38.7% with water cooling and 36.6% with air cooling</i> <i>Supercritical technology – 40.0%</i> <u>Justification:</u> Selecting the efficiency of Chinese plants as a proxy for all non-Annex I plants is not appropriate.	This value has to be country-specific or grid-specific (as applicable) based on the extent of geographical region determined as per Step 1.3 in Approach 2 for calculating baseline emissions	