

TABLE FOR COMMENTS

Name of submitter: Mr. Climate, Stephen

Affiliated organization of the submitter (if any): _____

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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: The intent of the baseline methodology should be to identify the technology that is being implemented without consideration of CDM benefits. Including under-validation projects or projects requesting registration or projects rejected for reasons other than CDM consideration, in the baseline assessment, will not result in the determination of the correct baseline. It is for the same reason that such projects are also relieved from the common practice analysis as per Step 2 of para 47 in the latest version of the “Tool for the demonstration and assessment of additionality”	<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 3 Page 3/25	1	ge	<i>The plant has been issued with a government permit</i> Guidance Sought: There may be several permits from government agencies required for setting up a power plant. Specific guidance is sought on the definition and scope of government permit referred to in the methodology	Guidance requested from the Meth Panel	

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 1, bullet 4, Page 4/25	1	ge	<i>The government permit has not been issued for more than 5 years</i> <u>Justification:</u> It is not clear why under-implementation power plants, that have received a permit more than 5 years ago, should not be included in baseline assessment.	Should be removed from the draft of the methodology	
4	Baseline Methodology Procedure, Step 2 Page 4/25	1,2,3	ed	<i>Based on the power generation technology and the installed capacity of each plant identified in Step 1 above, calculate the market share of each technology, by dividing the total rated capacity of each technology by the total rated capacity of all identified plants</i> <u>Justification:</u> Since this section concerns with planned or under-implementation power plants, terms like “installed capacity” and “rated capacity” are misplaced	<i>Based on the power generation technology and the planned capacity of each plant identified in Step 1 above, calculate the market share of each technology, by dividing the total planned capacity of each technology by the total planned capacity of all identified plants</i>	
5	Baseline Methodology Procedure, Step 2 Page 4/25	1,2,3	te	<i>Based on the power generation technology and the installed capacity of each plant identified in Step 1 above, calculate the market share of each technology, by dividing the total rated capacity of each technology by the total rated capacity of all identified plants</i> <u>Justification:</u> Superior technologies are generally available of higher capacity ranges. Several webhosted projects reveal that subcritical plants generally have capacities less than 600 MW, supercritical plants have capacities of 600-1000 MW while ultra-supercritical plants have capacities greater than 1000 MW. As such, the results of market share, based on planned capacity, will appear skewed towards higher efficiency	<i>Based on the power generation technology of each plant identified in Step 1 above, calculate the market share of each technology, by dividing the total number of planned plants of each technology by the total number of all identified plants</i>	

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6	Baseline Methodology Procedure, Step 3, para 2 Page 4/25	1,2	ed	<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> Since this section concerns with planned or under-implementation power plants, terms like “installed generation capacity” are misplaced	<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 planned generation capacity</i>	
7	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> Superior technologies are generally available of higher capacity ranges. Several webhosted projects reveal that subcritical plants generally have capacities less than 600 MW, supercritical plants have capacities of 600-1000 MW while ultra-supercritical plants have capacities greater than 1000 MW. As such, the results of market share based on installed capacity will appear skewed towards higher efficiency	<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>	

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8	Baseline Methodology Procedure, last para Page 15/25	4,5,6,7,8,9	te	<i>The DOE shall check the fuel consumption and electricity generation against records on purchased fuel and sold electricity for all identified power plants; if such information is not available, the DOE may check against government publications provided that the data are collected and verified by a governmental organization and they are based on the actual fuel consumption and electricity generation of the plants and not derived from other data (e.g. regulations)</i> <u>Justification:</u> Referring to the letter submitted by an external stakeholder to the CDM EB (http://cdm.unfccc.int/stakeholder/submissions/2012/0208_rao_reg.pdf), it is understood that fuel consumption data of identified power plants was not available in India in the form as required in the previous version methodology. No correction has been made to this end. Further, considering that secondary data (CEA) is used by DNA of India to compute grid emission factors, guidance is sought if the approach suggested by the stakeholder or CEA data may be considered appropriate by a DOE, for calculating the fuel consumption of plants in baseline plants, in line with paragraph 72 of the meeting report for 58th meeting of the CDM EB	<i>The DOE shall check the fuel consumption and electricity generation against records on purchased fuel and sold electricity for all identified power plants. If such information is not available, the DOE may validate if the fuel consumption and electricity generation values, mentioned in the CDM-PDD, are derived as is or calculated from publications used by governmental organization of the host country to calculate the grid emission factors.</i>	
9	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 used by project proponents to decide upon the investment to be made. Demonstrating additionality on the basis of efficiency provided in the feasibility report while estimating emission reductions based on some default minimum value, seems neither appropriate nor rational	Should be removed from the draft of the methodology	

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10	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> It may not be appropriate to use the average of measured efficiencies of Chinese coal fired power plants as a proxy for efficiency across all non-Annex I countries	Should be removed from the draft of the methodology	