

TABLE FOR COMMENTS

Name of submitter: Mr. Rao, M S K V N

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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, bullet 3 Page 3/25	1	ge	<i>The plant has been issued with a government permit</i> Guidance Sought: Different countries have different procedures and pre-requisites, different permits for setting-up of any project. There is an ambiguity in this area. Moreover, the data on permits of such proposed plants may not be made publicly available at all levels and in all countries. The publicly available data from any government or semi governmental agencies can be used for selecting the list of plant. Also, lacking specificity or an option of specific permits, leads to different interpretation by different DOEs. An amendment in this regard is required in the methodology	Guidance requested from the Meth Panel	
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. What is the basis of taking 5 years as cut off duration? Also, from which date the 5 years duration has to be counted?	Should be removed from the draft of the methodology	

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3	Baseline Methodology Procedure, Step 2 Page 4/25	1,2,3	ed	<p><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></p> <p>Justification: The identification of baseline technology deals with proposed or under-implementation power plants. However, in several places, phrases like installed capacity and rated capacity have been used. Consistency is sought for if only planned power plants are being considered for baseline assessment, these phrases are misplaced</p>	<p><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></p>	
4	Baseline Methodology Procedure, Step 3, para 2 Page 4/25	1,2	ed	<p><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></p> <p>Justification: The identification of baseline technology deals with proposed or under-implementation power plants. However, in several places, phrases like installed capacity and rated capacity have been used. Consistency is sought for if only planned power plants are being considered for baseline assessment, these phrases are misplaced</p>	<p><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></p>	

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5	Baseline Methodology Procedure, last para Page 15/25	4,5,6,7,8,9	te	<p><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></p> <p>Justification: Referring to the letter submitted by me previously to the CDM EB (http://cdm.unfccc.int/stakeholder/submissions/2012/0208_r_ao_reg.pdf), it is mentioned 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.</p> <p>Taking into account the fact that secondary data (CEA) is used by DNA of India to compute grid emission factors, guidance is sought if the approach suggested in the letter 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</p>	<p><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></p>	
6	Appendix 1 Page 24/25	Row 3,4	te	<p><i>Subcritical technology – Minimum value of efficiency for subcritical technology will be 38.7% with water cooling and 36.6% with air cooling</i></p> <p><i>Supercritical technology – 40.0%</i></p> <p>Justification: Selecting the efficiency of Chinese plants as a proxy for all non-Annex I plants is not appropriate</p>	<p>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.</p>	