

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> <u>Justification:</u> The baseline methodology has to identify the technology that is being implemented without consideration of CDM benefits. Including power plants requesting registration as CDM project activities or under validation, in the baseline assessment, will not result in the determination of the correct baseline. Similar approach is used in common practice analysis where projects under validation projects are relieved from the 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 3 Page 3/25	1	ge	<i>The plant has been issued with a government permit</i> <u>Guidance Sought:</u> There might be several permits from government agencies required for setting up a power plant. The definition of government permit for use in the methodology is not clear. Further, such data for other power plants may not be publicly available.	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 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> Advanced technologies are generally available of higher capacities. Thus, as per the methodology, two subcritical plants of 500 MW each will have same market share as one ultra-supercritical plant of 1000 MW. This is not appropriate; rather, market share must be calculated based on number of plants.	<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	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> No guidance is provided on the verification procedure the DOE needs to undertake to ensure the data collected is verified by a government organization. The information note on ACM0013 published in the 53rd meeting of the Meth Panel has commented on the use of Central Electricity Authority (CEA) data in India for estimation of fossil fuel consumption. Taking note of the fact that such data is used for estimation of build margin and operating margin in the host country, guidance is sought if the same may be considered appropriate enough by the DOE during validation.	<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>	