Suggestion:1

In this revision of methodology under "**Technology/Measures**" it is proposed to remove the definition of *"existing facility"* as given in footnote_1 of existing version -4 of methodology which in footnote reads as under:
"facility that is existing on the starting date of the project activity (see definition in paragraph 67 of the EB 41 meeting report) and all options for demonstrating the use of waste energy in the absence of a CDM project activity shall be based on historic information and not on a hypothetical scenario."

In place of the above definition in footnote the following definition of existing facility is being placed in the main text of the methodology draft version webhosted for the Call for inputs:
"***2. Existing facilities (includes the project facility and the recipient facility) are those that have been in operation for at least three years immediately prior to the start date of the project activity (see definition in paragraph 67 of the EB 41 meeting report). All options for demonstrating the use of waste energy in the absence of a CDM project activity shall be based on historic information and not on a hypothetical scenario.***"

In this regard we wish to submit as follows:
In the above mentioned definition as proposed in the draft revision of the methodology the definition of "existing facility" includes two part first is "project facility" second is "recipient facility". As this methodology is mainly being used for power generation through waste heat recovery thus the interpretation of scenario's of facilities can be done as follows:

1. Project facility: The facility where the WECM is generated (such as sponge iron; blast furnace; coke oven; clinker production in Cement etc) which would be recovered under project activity.
2. Recipient facility: The facility where utilization of electricity generated would take place. As electricity cannot be stored and have to be utilized (i.e. through captive use or through wheeling or through exporting/dumping to grid etc.). If any of the options is available (i.e. existing) then recipient facility will be considered as "existing", as grid is always there to receive power, thus "GRID'' as a permanent recipient facility likely to be always there. Thus imposing a condition even to prove the grid as a recipient facility with "last three year data immediately prior to the start date of project activity' does not have any purpose or significance; as grid is/will always be there and thus historical data; therefore should not be required for grid.

Thus we request you to kindly exclude the word 'recipient facility" completely as this fundamentally does not serve any purpose and would rather create more and more confusion.

However if the EB feels it utmost necessary then the definition can be given as follows"

"*2. Existing facilities (~~includes the project facility and~~ project facility) are those that have been in operation and were not having any use of waste heat in the process thus the waste heat was being emitted to atmosphere without any use for at least ~~thre~~ one years immediately prior to the generation of power from ~~start date~~ of the or implementation of the project activity ~~(see definition in paragraph 67 of the EB 41 meeting report)~~. All options for demonstrating the use of waste energy in the absence of a CDM project activity shall be based on historic information for one year period prior to the commencement of power generation from the or implementation of the project activity and not on a hypothetical scenario.*"

Suggestion:2

Further to this under para 12 of revision of methodology proposed it is mentioned

"*12. Baseline emission calculations shall be based on relevant historical data immediately prior three years to the start date of the project activity (or the start date of validation with due justification). For existing facilities with less than three years of operational data, all historic information shall be available (a minimum of one year operational data would be required).*"

Here we suggest that instead of "start date of project activity" the word "project implementation' or commencement of operation of the project activity" gives better result, as actual emission reduction will only takes place at the time when project activity is implemented or its operation is started. Thus if data for one year of operation of project facility is available on the date of "implementation of project activity" then it will be the appropriate for the determination of baselines emissions.

The suggested revision in para-12 is as follows:

"*12. Baseline emission calculations shall be based on relevant historical data immediately prior one ~~three~~ years~~s~~ to the implementation (i.e. commencement of operation) ~~start date~~ of the project activity (or the start date of validation with due justification). For existing facilities with less than one ~~three~~ years~~s~~ of operational data, all historic information shall be available (a minimum of six months ~~one year~~ operational data would be required).*"

Suggestion:3

Under equation No. (1) for baseline calculation there is provision for $f_{WCM,}$ which is the brought there only for sake of arriving fraction of energy provided by waste energy containing materials, further to this is multiplied with $EG_{i,j,y}$ which means $EG_{i,j,y}$ is the figure from which fraction is required to be derived. But $EG_{i,j,y}$ is defined as follows:

"*The quantity of electricity supplied to the recipient "j" by generator, that in the absence of the project activity would have been sourced from "i^{th}"source (i can be either grid or identified existing source) during the year y in MWh*"

Whereas the phrase *"in the absence of project activity would have been sourced from ith source"* clearly indicate the *"only portion/fraction of useful energy that is generated due to project activity"*. Thus this does not involve the energy from other sources than the project activity, hence how can f_{WCM} will be applied here. Then there is no need to further multiplication of f_{WCM} to this. Thus it requires to be suitably corrected.

*Or else the definition should be changed accordingly for $EG_{i,j,y}$ as "**The quantity of electricity supplied to the recipient j by generator(j is the useful energy generation facility which includes any other generation facility operating along with the Project activity to generate power) , that ~~in the absence of the project activity~~ would have been sourced from ith source (i can be either grid or identified existing source) during the year y in MWh***

Suggestion:4

As this is a SSC methodology; thus simplification of baseline and monitoring methodology should be well justified and simplified.

But why the Greenfield project activity are not allowed under this methodology? For simplification it can be proposed that Baseline should be exiting scenario, or hypothetical baseline or Greenfield baselines are not allowed under methodology. Or else like AMS I.C. various baseline option can be included in methodology for further simplification. But only for the sake of existing project facility the restriction of application of this methodology as proposed to be amended with at least three years historical data prior to the starting date is not justified. Thus it is suggested to either keep this as it is or allow only one year's data from the implementation /commencement of power generation from project activity.