

TABLE FOR COMMENTS

0	1	2	3	4	5	6	7
#	Initials	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	PDF	Sources	28	ge	The Tool "Emissions from solid waste disposal sites" is still a draft version, which has not yet been implemented.		
2	PDF	Definitions	49,50,51	te	In the previous version, the normal temperature is 0°/273.15k. It is not understood why a change is proposed in this version.	No change to the normal temperature is needed.	
3	PDF	Applicability	63	te	We assume this methodology also applies to projects with the purpose of upgrading LFG for CNG production.	Change to "Supplied to consumers through a natural gas distribution network, including upgrading and trucks."	
4	PDF	Applicability	57/58 versus 73/74	te	Applicability is limited to activities which install: a) a new LFG capture system or b) increase the recovery rate at an existing LFG capture system (57/58) – this doesn't include existing systems which do not change the recovery rate but change the usage of the LFG (73/74)	Please improve consistency. Under "Applicability", include "existing systems which do not change the recovery rate but change the usage of LFG", as described later in the methodology (in line 73/74).	
5	PDF	Applicability	87	te	Scenarios of natural gas distribution should also be applicable.	Include: (c) For natural gas distribution: that natural gas would be distributed by existing distribution network.	
6	PDF	Project boundary	99	te	Should include the thermal power plant, which are supplying thermal power in the baseline that is displaced by thermal power generated by captured LFG in the project activity.	Include "Captive thermal plant(s) or thermal sources, which are supplying thermal energy in the baseline that is displaced by thermal energy generated by captured LFG in the project activity"	
7	PDF	Table 1	102	ed	Under "Emissions from the use of natural gas": It should be the other way round, to reflect the explanation: CO2: no; CH4: yes	Swap to CO2: no and CH4: yes	
8	PDF	Project boundary	119	ed	The new version is better structured and does not use the "Step 1 to step 4" approaches to select the baseline scenario. Nevertheless "Step 1" is stated in line 119.	Delete "Step 1: " in line 119	
9	PDF	II	127-128; 217	ed	..., or to address safety and odour concerns; The end of the sentence is too vague and open for interpretation. The only valid reference should be regulations.	Delete ", or to address safety and odour concerns"	
10	PDF	II	135 – 140 and 142 – 150	ed	The previous meth version includes a numeration of the scenarios (P1...P6, H1...H7).	Add numeration again to make it easy to reference the scenarios in the PDD	

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11	PDF	Baseline emissions step A.	175	te	Is this necessary? A practical methodology should be of widespread applicability and facilitate application. Furthermore the top oxidation effect itself is full of dispute. For projects of different management standard, the effect varies sharply. Whether it means a more complex assessment measures and procedures should be established for this effect? This would just make CDM registration and verification more difficult and less efficient.	Such an effect should not be considered in the methodology, because the effect itself is disputable.	
12	PDF	Baseline emissions step A.	179 / 185 / 186	te	This effect is difficult to determine. Indeed the suction of air could reduce the methane generation but it depends on the way the SWDS is operated. The biggest problem is how to assess the influence on methane generation in SWDS. A general factor/value is very difficult to prove. It is clear that a different value will come out from different SWDSs of different technology and management standard. This effect needs in-depth investigation before its inclusion in the methodology.	Such an effect should not be considered in the methodology, because the effect is too difficult to determine. Either remove from methodology or provide the option of setting the value=0 until further guidance is available.	
13	PDF	Baseline emissions step A.1	195	te	“... and no emission reduction should be claimed for methane destruction during non-working hours” In the previous version the operational hours could only be used for cross checking of the results of longer intervals, for example of the total monitoring period. This requirement would complicate the monitoring enormously because the operation of, for example a PGU, would have to be monitored and recorded continuously and not only recorded in longer intervals. At a PGU there is a device monitoring and recording the operational hours; the value is used mainly for maintenance purpose but it could also be used for cross checking. Usually there is no interface for a continuous recording. At the least a definition is missing to define the status “engine is operational”.	The working hours of the power plant(s), boiler(s), air heater(s) and kiln(s) should be monitored <u>and should be used for cross checking the amounts of produced electricity or heat</u> ”	
14	PDF	Baseline emissions step A.2	213	ed	missing '=' between ηPJ and 'The efficiency of the capturing...'		

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15	PDF	Baseline emissions step A.2	215 and 219	ed	In line 215 it says "(...)adjustment factor (f) to account for LFG in the baseline that would have been captured and destroyed to comply with relevant regulations or contractual requirements, or to address safety and odour concerns." In line 219, on the other hand, it is stated "f in the tool shall be assigned a value of 0." This is confusing.	Replace line 219 with the guidance provide in line 215 through 217.	
16	PDF	Baseline emissions step A.3	287	ed	There is no description here on how F_CH4,BL,R,y could be determined	Include reference to "Case B", where the determination is described in detail	
17	PDF	Data and parameters not monitored	360	te	Is the value of 0.1 reasonable, provided that the magnitude of the effect still remains unknown, (as noted above, for line 175).	The effect should not be considered in methodology.	
18	PDF	II, data and parameters not monitored	364	ed	"Any comment: Used to determine F_CH4,BI,y. <u>Must be updated at renewal of the crediting period.</u> " Doesn't make sense because the value before implementation of the project will remain; there will be no newer value available	Delete: <u>Must be updated at renewal of the crediting period.</u>	
19	PDF	III.	377 to 381	ed	parameters not in subscript		
20	PDF	III.	377 to 381	ed	parameters not in subscript		
21	PDF	Figure 1	388	ed	P is used twice: for Pressure and for production of bricks	Use different parameter name for production of bricks.	
22	PDF	Figure 1	388	te	Figure 1 is not consistent with parameters to be monitored. Specifically: - the measurement/monitoring of temperature, pressure and operational hours - the measurement/monitoring of CH4 - the measurements of electricity and thermal energy, fossil fuel for the kiln	- Include pressure, temperature and operational hour measurements in the parameter tables to reflect Figure 1. Monitoring P could be optional in case of use of mass flow meters. - adjust the CH4 measurement specifications in parameter tables to reflect Figure 1. - include measurements of electricity and thermal energy, fossil fuel for the kiln in the parameter table to reflect Figure 1	
23	PDF	Data and parameters to be monitored	406, 407	ed	Change comment – monitoring almost not possible, see comment above regarding line number 195	The working hours of the power plant(s), boiler(s), air heater(s) and kiln(s) should be monitored <u>and should be used for cross checking the amounts of produced electricity or heat</u>	

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24	PDF	Data and parameters to be monitored	Figure 1 and 406- 417	Ge	The measurement procedures for LFGHG are referring to flare when the parameter is described as the "amount of LFG used for thermal energy generation".	- Correct measurement procedures in the parameter table for "Amount of LFG used for thermal electricity generation..." (line 414).	
25	PDF	Data and parameters to be monitored	413	te	Is the $NCV_{LFG,y}$ necessary ? The LFG is not a standard fuel that has a consistent composition. Actually LFG consist of different kinds of gas; the heat value varies continuously with the variation of methane content in LFG.	This parameter can be removed from the methodology.	