



PROJECT DEVELOPER FORUM

Session : Monitoring Guidelines

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Dr. Sven Kolmetz, Climate Bridge, Co-Vice Chair Project Developer Forum

Monitoring Plan should be specified during First Verification in the Monitoring report

- ❑ Para 56 of the PS: As the detailed monitoring plan is mostly not available during the validation stage and to avoid lengthy and time consuming prior approval as far as possible we would like to replace “The monitoring plan shall also include the following...” by “The **description of the monitoring plan** shall also include the following” to make clear that the monitoring plan in the PDD is a framework for the real monitoring plan applied at the beginning of the monitoring.
- ❑ It is sufficient to determine the uncertainty levels, the calibration frequency and the sampling plan in the beginning of the verification.

Comments on the circulated text

- ❑ Chapter 2 - consistency: Minor editorial and non-material changes should be allowed and material changes in the monitoring plan should be allowed upon proper justification and without resulting in overestimation of emission reductions (after approval of the UN, if appropriate)
- ❑ Chapter 3 – last para c: it is not clear what kind of information on the laboratory need to be provided. The meters and analysis is often under the control of the power utility and the project owner does not have direct access to this information
- ❑ Chapter 4.1 project boundary: change to “... **main** equipment and installation”

Further determination of post-registration changes not needing prior approval I

Change	Comments
Corrections	
Name of the transformer station	
Location of the transformer station	Without changing the voltage
Changes to the project design of a registered project activity	
Change of equipment type (e.g. different manufacturer, different unit capacity)	Total investment and installed capacity remain the same
Change in one parameter of investment analysis (e.g. total investment) but still within the bounds of sensitivity analysis	
Different type of biomass burned to that in registered PDD (for biomass fired plant)	

Further determination of post-registration changes not needing prior approval II

Permanent changes from the registered monitoring plan or applied methodology

Change of location of meter (within control of PP)

Change of accuracy of meter (within control of PP)

Change in calibration frequency of meter (within control of PP)

Change in number of meters (outside of control of PP)

Temporary deviations from the registered monitoring plan or applied methodology

Using backup meters/ back up calculation due to the main meter failure, as described in the registered PDD

Change in frequency of monitoring certain parameters

Monitoring alternative parameter to that required by the methodology but which leads to same result (e.g. ACM004 project monitoring steam consumption for start-up rather than auxiliary fuel)

Temporary deviations that are clearly immaterial (below the materiality threshold)

Cross-checking meter readings with alternative documents instead of sales receipts (May happen at the beginning and end of monitoring periods when these dates do not match with the date that the grid company reads meters)

Conservative approaches beyond 0 or 100% must be possible

Para 245 VVS: definition of “most conservative assumption **theoretically** possible” be included in the guidance.

Example: during a short period within the monitoring period the continuous flow meter readings for gas towards the engine are missing (malfunctioning,). However operational records clearly indicate that the engine has been running and producing electricity during the period of the meter failure. The missing data on the volume of gas can in this case be (back) calculated on the basis of engine running hours and load. A correlation between running hours and gas consumed could be based upon historical data set (or data set after restoring event) to support the validity of replacement data. Requesting 0 in this case seems to be overly conservative.

Apply materiality in verification more flexible

- ❑ The application of the concept of materiality to errors, omissions and missing data, particularly in PoA is currently very limited
- ❑ Where data from a source of emissions is missing and it represents less than x% of total project or baseline emissions, it may be estimated by the PP based on alternative measurements or calculations and accepted by the DOE if the DOE comes to the reasonable assurance that the according emissions are below the materiality threshold and will not be overestimated.

Apply only one single conservativeness factor

- ❑ Methodologies should focus on accuracy with a single conservativeness factor deducted transparently at the end rather than arbitrary adjustments to default factors within the methodologies.
- ❑ **Background:** CDM already now contributes to net mitigation due to its rigorous conservativeness. This is not recognized by the public because conservative factors are hidden in complex calculations.
- ❑ **Example:** there are conservative factors for flare efficiency that are not in line with actual efficiencies.
- ❑ **Benefit:** project developers could show the real emission reduction and finally apply a factor that can be derived by summing up the proportional factors hidden in the meth

Accept conservative default values in case of hazardous fuel streams

- ❑ In case of small flows of hazardous fuels (less than 10% of the energy content) where taking samples for the determination of the NCV is causing unacceptable risks to the project conservative default values and/or alternative methods should be accepted.
- ❑ **Example:** ACM006 requires the monitoring of ALL biomass streams. In paper and pulp industries there are biomass streams such as sander dust (extremely flammable) or organic gases (toxic and highly odorous) where monitoring would create a significant and unacceptable risk for the plant. Therefore these flows are directly pumped to the boiler to dispose them. Alternative methods for the determinations of the flow and NCV are available.

PoA: CPA verification should not be limited to one per monitoring period

- ❑ PoA rules require all CPAs to seek issuance at the same time. This means they all need to undergo verification simultaneously
- ❑ There are PoA having 50+ CPA, with several different investors: a manufacturer, a government, and the project developer. Each investor's IRRs and risk profiles are different, and they correspondingly work at different timelines holding the most efficient implementer hostage to the timelines - and risk - of the slowest participant.
- ❑ EB 74 agreed and allowed two issuances per MP
- ❑ Where does this stand today? When can we expect the EB 74 decision to be effective?

- ❑ **Shift the preparation of the final monitoring plan to a more mature stage of project implementation**
- ❑ **Enhance and specify the situations not needing PRC approval**
- ❑ **Application of conservativeness should still remain in the range of what is technical possible**
- ❑ **Use only one single conservativeness factor**
- ❑ **Allow conservative monitoring approaches for hazardous fuels with small impact on the emissions**
- ❑ **Consider materiality when applying conservativeness**

Thank you for your attention

The Project Developer Forum (PD-Forum) is a collective voice to represent the interests of companies developing greenhouse gas (GHG) emission reduction projects in international markets under the Clean Development Mechanism (CDM), Joint Implementation (JI) and other carbon emission reduction schemes and programs.

See our members at: www.pd-forum.net