




F-CDM-RtB

 <b>CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1)</b> <i>(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)</i>	
Name of the stakeholder <sup>1</sup> submitting this form (individual/organisation):	Mr.Jung Young Geon National Agricultural Cooperative Federation
Address and Contact details of the individual submitting this Letter:	Address: 1-75, Chungjungro, Junggu, Seoul City, Korea Telephone number: +82-2-3774-2247 E-mail Address: <a href="mailto:gy.yoon@miraeasset.com">gy.yoon@miraeasset.com</a>
Title/Subject (give a short title or specify the subject of your submission)	Query on the calibration requirement for the electric meter that is used to measure the imported electricity amount
Please mention whether the Submitter of the Form is:	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other Stakeholder, please specify
Specify whether you want the Letter to be treated as confidential <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<b>Purpose of the Letter to the Board:</b>	
Please use the space below to describe the purpose for submitting Letter to the Board. (Please tick only one of the four types in each submission )	
<input type="checkbox"/> <b>Type I:</b> <input checked="" type="checkbox"/> <b>Request Clarification</b> <input type="checkbox"/> <b>Revision of Existing Rules</b> <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input checked="" type="checkbox"/> Guidance. Please specify reference -“Guidelines for assessing compliance with the calibration frequency requirements” <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference <input type="checkbox"/> <b>Type II: Request for Introduction of New Rules</b> <input type="checkbox"/> <b>Type III: Provision of Information and Suggestions on Policy Issues</b>	
Please use the space below to describe in detail the issue that needs to be clarified/revised or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any).	
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<a href="#">This is the inquiry about the calibration requirement for the electric meter that is used to measure the imported electricity</a>	

<sup>1</sup> Note that DNAs and DOEs shall not use this form to submit letter to the Board.

<sup>2</sup> Note that the Board may decide to make this Letter and the Response publicly available



amount. The related project activity is '14MW MIRAE ASSET PV(photovoltaic) power plant bundling project, Project 3296', which is already registered as CDM on 16 Oct 2010.

## 1. Related statements in AMS I.D Ver. 13, “General Guidelines to SSC CDM methodologies” and “Guidelines for assessing compliance with the calibration frequency requirements”

### 1.1. AMS I.D

- No specific guideline on the consideration of electricity import in ER calculation.

### 1.2. “General Guidelines to SSC CDM methodologies”

- It states *‘Measuring equipment should be certified to national or IEC standards and calibrated according to the national standards and reference points or IEC standards and recalibrated at appropriate intervals according to manufacturer specifications, but at least once in three years’*

### 1.3. “Guidelines for assessing compliance with the calibration frequency requirements”

- It states *“In cases where the DOE verified that it is not possible for PP to conduct the calibration at a frequency specified by either the applied methodology, CDM EB guidance, and/or the monitoring plan due to reasons beyond the control of project participant, the DOE prior to finalizing its verification, shall submit a request for revision of the monitoring plan.”*

## 2. Monitoring Plan in the registered PDD

In B.7.2 of PDD states *“Calibration of Meters & Metering should be implemented every three years according to related national standards”*.

## 3. Current situation & problem of the project activity in terms of CDM monitoring

**3.1. Current status:** 1<sup>st</sup> monitoring period in place and DOE verification not started

**3.2. Number of monitoring equipments for this project:** Two (One electric meter for power import – ‘Meter A’ and one electric meter for power export – ‘Meter B’, both of which are operated separately)

**3.3. Main Problem:** It is impossible for PP to conduct the calibration of ‘Meter A’ at a frequency specified by “General Guidelines to SSC CDM methodologies” and the monitoring plan in the PDD as the calibration is beyond the control of project participant. The electric power import is satisfied by the grid electricity for this project. In Korea, if the consumer uses the grid electricity, the corresponding amount is measured by the electric meter, which is installed, owned and operated by the grid operator<sup>3</sup> and it has been impossible to take actions (breaking the sealing/sending the meter to the third calibration institution etc.) to calibrate their meter. In addition, the grid operator refused to provide the original calibration report (issued when the meter is manufactured) to the PP as it is not their responsibility. In result, the project participant has already finished the calibration of ‘Meter B’ while it is impossible to calibrate the ‘Meter A’.

## 3.4. Query and proposal on the possible action taken by

### 3.4.1. Query

- Which action should be done before DOE verification or CER issuance request to solve the problem described above? (Please consider the proposals below whether the proposal is eligible)

### 3.4.2. Issues regarding the possible solution

- Specific guideline is necessary on how the monitoring plan should be revised when the calibration is beyond the control of project participant.

- Currently, according to the national regulation<sup>4</sup>, ‘Meter A’ will be replaced by the grid operator every 7 years whether or not the monitoring plan in the PDD is revised.

- For the electricity import, the grid operator issues the monthly statement including consumption amount/price/invoice. As it is issued by the national authority, it can be regarded as reliable source.

- Electricity import is trivial compared to the electricity generation (less than 1%).

<sup>3</sup> Korea Electric Power Company(<http://www.kepco.co.kr/>).

<sup>4</sup> For Meter A, national regulation requires the replacement or calibration of the meter every 7 years (In most cases, replacement is done). But as for Meter B, national regulation requires the calibration of the meter every 3 years.



**3.4.3. Possible solutions (proposed by PP)**

**3.4.3.1. Solution proposal 1:** No the revision of monitoring plan in PDD. The use of the monthly statement for the power consumption in ER calculation. Applying the maximum permissible error in ER calculation. Replacement of the meter for electricity import every 7 years by the grid operator. (No calibration will be done by PP)  
 - For example: [Electricity import amount of the monthly statement] x [the maximum permissible error from the manual/manufacturer]

**3.4.3.2. Solution proposal 2:** Revise the Monitoring plan. State in the revised monitoring plan that the use of the monthly statement for the power consumption will be used for the electricity import amount in ER calculation. Applying the maximum permissible error in ER calculation. Replacement of the meter for electricity import every 7 years by the grid operator. (No calibration will be done by PP)

**Attached files containing relevant information:** CDM-registered version of PDD for this project

Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).

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N/A

If necessary, list attached files containing relevant information (if any)	<ul style="list-style-type: none"> <li>CDM-registered version of PDD for this project            -Project Veiw page:  <a href="http://cdm.unfccc.int/Projects/DB/KEMCO1263966884.77/view">http://cdm.unfccc.int/Projects/DB/KEMCO1263966884.77/view</a></li> </ul>
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**Section below to be filled in by UNFCCC secretariat**

Date when the form was received at UNFCCC secretariat	

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**History of document**

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
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