




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. M S K V N Rao
Address and Contact details of the individual submitting this Letter:	Address: G-807, Purva Panorama, Kalena Agrahara, B.G Road, Bangalore-560076, India Telephone number: 080-2648079 E-mail Address: <a href="mailto:mkskienag@gmail.com">mkskienag@gmail.com</a>
Title/Subject (give a short title or specify the subject of your submission)	Request to consider the suggestion on arriving at FC <sub>j</sub> and FC <sub>n,v</sub> as first-hand data monitoring of the same are not published / not made available to the project activity developers in host country (India) or any host country which has similar situation.
Please mention whether the Submitter of the Form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify <b>Individual / PDD developer</b>
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><u>Purpose of the Letter to the Board:</u></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> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;"><input type="checkbox"/> Request Clarification</div> <div style="border: 1px solid black; padding: 2px;"><input checked="" type="checkbox"/> Revision of Existing Rules</div> </div> <ul style="list-style-type: none"> <li><input type="checkbox"/> Standards. Please specify reference</li> <li><input checked="" type="checkbox"/> Procedures. Please specify reference <a href="#">ACM0013, Version 4</a></li> <li><input type="checkbox"/> Guidance. Please specify reference</li> <li><input type="checkbox"/> Forms. Please specify reference</li> <li><input type="checkbox"/> Others. Please specify reference</li> </ul> <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>	

<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



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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This clarification or suggestion request, is made in the context of the following “comment” included in the data table for  $FC_j$  and  $FC_{n,v}$  on page 11/18 of the approved consolidated methodology ACM0013, Version 4:

*“The DOE should verify that the data on fuel consumption is based on first-hand measurements of the actual quantity of fuel consumed by each power plant, and is not based on second-hand calculations or estimations”*

and wherein, the source of data has been requested from,

*“Measurements of the fuel consumption in each power plant  $j$  or  $n$ , e.g. provided in statistics from central/regional regulatory authorities”*

The request for consideration of the procedure of estimation of  $FC_j$  and  $FC_{n,v}$  is given in the box below;

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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Please note that in India (host country), the onus of collating and maintaining such statistics as mentioned above lies with the Central Electricity Authority (CEA)<sup>3</sup>. In line with this requirement, the CEA has developed formats<sup>4</sup> using which all thermal power plants are mandated to report various operational parameters to CEA at a pre-defined frequency.

Based on this data, the CEA publishes, on an annual basis, a database<sup>5</sup> containing the operational parameters of all these thermal power plants (including those which get included in the baseline sample group, as defined by the methodology).

Among others, the following information is published, as a part of these database:

1. Name of power plant
2. Date of commissioning
3. Installed Capacity
4. Region (refers to the two regional grids of India)
5. Primary Fuel used
6. Secondary Fuel used
7. Net Generation in fiscal year (in terms of GWh and referred to as  $EG_j$  hereafter)

<sup>3</sup> Clause (i) of Section 73 (Part IX – Central Electricity Authority) of the Electricity Act, 2003, Page 39 ([http://www.cea.nic.in/reports/electricity\\_act2003.pdf](http://www.cea.nic.in/reports/electricity_act2003.pdf))

<sup>4</sup> List of formats, frequency(ies), target date(s), mode(s) of data furnishing and designated officers ([http://www.cea.nic.in/general\\_review\\_prof.html](http://www.cea.nic.in/general_review_prof.html))

<sup>5</sup> CEA database publications ([http://www.cea.nic.in/reports/planning/cdm\\_co2/cdm\\_co2.htm](http://www.cea.nic.in/reports/planning/cdm_co2/cdm_co2.htm))



Additionally, specific consumption of coal (in terms of kg/kWh, and referred to as  $SFC_j$  hereafter) being used for a particular plant may be sourced from the Tariff Order for that particular power plant, as approved by Central Electricity Regulatory Commission (CERC). It may kindly be noted here that it will be possible for any regulatory body to make such a disclosure of operational parameters, only based on fuel consumption of the particular plant made available to them. However, the same is not being published in the format as requested in Version 4 of the methodology. It is on account of this reason that the guidance (which was introduced for the first time in the latest version of the methodology) “*The DOE should verify that the data on fuel consumption is based on first-hand measurements of the actual quantity of fuel consumed by each power plant,*” may not be possibly met *in-verbatim* by any project activity in the host country (India).

**Suggestion / Request to consider:**

At the same time, it is possible to arrive at the actual fossil fuel consumption considering the various published and authentic sources of information available in the host country (India) or any country which has similar data publishing practice through government agency or through any recognised associations in the field. One such method has been described as follows:

$$FC_j = SFC_j \times EG_j$$

Where

$SFC_j$	Specific coal consumption in plant j (kg/kWh)
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Using the above method, fossil fuel consumption of any thermal power plant can be back calculated accurately. Nevertheless, as the above derivation of value for  $FC_j$  is relying on publicly available and authentic information, it is requested to consider the above suggestion of calculation in arriving at Fuel consumption in the candidate methodology (ACM0013: while making its revision) and make provision for completion of validation for DOE to accept such fossil fuel consumption values of plants included in the baseline sample group.

If necessary, list attached files containing relevant information (if any)

- References are given in the footnotes

**Section below to be filled in by UNFCCC secretariat**

Date when the form was received at UNFCCC secretariat

8 February 2012

2012-072-S

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**History of document**

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		