

	CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)
	This form should be used only by project participants and other stakeholders for submitting a “Letter to the Board” in accordance with the latest version of the <i>Modalities and procedures for direct communication with stakeholders</i>
Name of the stakeholder ¹ submitting this form (individual/organization):	Name: Cynthia Hendrayani Organization: NAVIGAT ORGANIC ENERGY INDONESIA, PT
Address and contact details of the individual submitting this form:	Address: Lt 18 Panin Tower, Senayan City Complex Jl. Asia Afrika Lot 19, Jakarta 10270, Indonesia Telephone number: +62 21 7278 2353 E-mail address: cynthia.hendrayani@noei.co.id
Title/Subject (give a short title or specify the subject of your submission)	Clarification for method to assigning default value efficiency of a flare unit.
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 ² :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
Please choose any of the type(s) below ³ to describe the purpose of this submission.	
<p><input checked="" type="checkbox"/> Type I:</p> <p style="margin-left: 40px;"> <input checked="" type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules </p> <p style="margin-left: 80px;"> <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input checked="" type="checkbox"/> Others. Please specify reference : </p> <p style="margin-left: 120px; color: blue;"> EB28 Annex 13: “Tool to determine project emissions from flaring gases containing methane” </p> <p><input type="checkbox"/> Type II: Request for Introduction of new rules</p> <p><input type="checkbox"/> Type III: Provision of information and suggestions on policy issues</p>	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

¹ DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

² As per the applicable modalities and procedures, the Board may make its response publicly available.

³ Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html> .

We operate a landfill gas to power project with a flare unit which is used intermittently only in situation where the power plant is unable to absorb the generated landfill gas. With sufficient capacity in the power generation unit, our facility almost never flare landfill gas for more than 30 minutes. For this reason, we find that the requirement to **assign hourly efficiency** in Tool is penalizing for our operation.

Our PDD adopted **default value efficiency for enclose flare** stipulated in "Tool to calculate project emissions from flaring gases containing methane" to calculate the project emission from flaring. In essence, the determination of **hour-by-hour** efficiency follows the following rules:

Observed Operating Condition:	Assigned HOURLY flare efficiency
Temperature <= 500degC for more than 20 minutes in an hour.	0%
Temperature >=500degC for more than 40minutes in an hour but outside the manufacturer's operational range	50%
Temperature >=500degC for more than 40minutes in an hour but within the manufacturer's operational range	90%

In our situation, our memograph records the flare exhaust temperature on minute-by-minute basis, thus the recording is performed with higher resolution than the prescribed hourly requirement of the Tool.

The information outline in the following table provides a typical snapshot of our flare operation, which rarely goes beyond 30 minutes, with manufacturer defined correct operating range being 1,000-1,200degC

Time Stamp	T (degC)	Interpretation of Condition	Proposed Assigned Efficiency
28/05/2012 10:57	33.00	Below 500degC and Below Manufacturer Spec	0%
28/05/2012 10:58	100.00	Below 500degC and Below Manufacturer Spec	0%
28/05/2012 10:59	252.00	Below 500degC and Below Manufacturer Spec	0%
28/05/2012 11:00	540.00	Above 500degC and Below Manufacturer Spec	50%
28/05/2012 11:01	933.00	Above 500degC and Below Manufacturer Spec	90%
28/05/2012 11:02	1,042.00	Above 500degC and Within Manufacturer Spec	90%
28/05/2012 11:03	1,102.00	Above 500degC and Within Manufacturer Spec	90%
28/05/2012 11:04	1,116.00	Above 500degC and Within Manufacturer Spec	90%
28/05/2012 11:05	1,106.00	Above 500degC and Within Manufacturer Spec	90%
28/05/2012 11:06	1,049.00	Above 500degC and Within Manufacturer Spec	90%
28/05/2012 11:07	1,017.00	Above 500degC and Within Manufacturer Spec	90%

We would like to request clarification, if, rather than determining HOURLY efficiency, we can instead assign flare efficiency on minute-by-minute basis, and hence calculates the corresponding Baseline Emission, Project Emission from Flaring LFG, and subsequent Emission Reduction on minute-by-minute resolution, instead of hourly basis.

We believe that the proposed method does not reduce the rigor of emission reduction accounting, and instead improve the accuracy of GHG accounting system by increasing resolution of calculation. Should the CDM EB agrees with this point of view, kindly advice if such changes represent a departure from the Tool and as such require a formal request for a change of monitoring plan?

Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).

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N/A

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

N/A

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	21 June 2012
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History of document

Version	Date	Nature of revision
01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
Decision Class: Regulatory Document Type: Form Business Function: Governance		