

 CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)	
<p>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></p>	
Name of the stakeholder ¹ submitting this form (individual/organization):	Carbon Market Watch [REDACTED]
Address and contact details of the individual submitting this form:	Address: Rue Albanie 117, 1060 Brussels, Belgium Telephone number: +32499212081 E-mail address: info@carbonmarketwatch.org
Title/Subject (give a short title or specify the subject of your submission)	Concerns about additionality of CDM Project 7096 Pamona 2 Hydroelectric Power Plant Project (Indonesia) currently requesting registration
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify NGO
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.	
<input type="checkbox"/> Type I: <ul style="list-style-type: none"> <input type="checkbox"/> Request for clarification <ul style="list-style-type: none"> <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 type="checkbox"/> Others. Please specify reference <input type="checkbox"/> Revision of existing rules 	
<input type="checkbox"/> Type II: Request for Introduction of new rules <input checked="" type="checkbox"/> Type III: Provision of information and suggestions on policy issues	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	
<p>The project 7096 is currently requesting registration (deadline for requesting registration is 22 November). However, due to the following concerns, we believe a review should be requested:</p> <p>The DOE has not provided a proper validation of input values related to the calculation of power density, Which is a parameter for hydro power projects including reservoirs to deter mine the amount of project related emissions.</p>	

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> .

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).

The Validation Report states at page 8, "The Lake Poso acts as a natural reservoir" implying that this constitutes the pre-project scenario, without the HPP. The reservoir area for pre-project scenario is however given at 0 m² (see validation report page 59). The Validation Report outlines a reservoir area of 150,000 m² for the after-project situation. This value has not been quoted in the Validation Report by means of appropriate documentation. Given therefore the information provided in the PDD: "The project activity is a run of river hydro-electric power plant built on a natural reservoir", the DOE should validate a) if the reservoir area will increase during project implementation (and if so, by what area) and b) if the value of 150,000 m² (APj - ABI) could be considered correct.

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

- [replace this bracket with text, the field will expand automatically with size of text]

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	20 November 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		