Name of the stakeholder submitting this form (individual/organization): Econergy Brasil Ltda

Address and contact details of the individual submitting this form:
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Title/Subject (give a short title or specify the subject of your submission):
Renewal of Crediting Period and Project plant configuration changes.

Please mention whether the submitter of the form is:
☒ Project participant
☐ Other stakeholder, please specify

Specify whether you want the letter to be treated as confidential:
☐ To be treated as confidential
☒ To be publicly available (UNFCCC CDM web site)

Please choose any of the type(s) below to describe the purpose of this submission.

☒ Type I:
☐ Request for clarification
☐ Revision of existing rules
☐ Standards. Please specify reference
☒ Procedures. Please specify reference

Renewal of the crediting period of a registered CDM project activity
Section XII.H of the CDM project standard
☐ Guidance. Please specify reference
☐ Forms. Please specify reference
☐ Others. Please specify reference

☐ Type II: Request for Introduction of new rules

☒ 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).

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](http://cdm.unfccc.int/Reference/index.html)
Dear all,

Econergy is a CDM consultancy with a huge experience in CDM Market since 2005. In our portfolio has around 50 registered CDM project with more than 7 million of issued CERs.

ESTRE’s Paulinía Landfill Gas Project (EPLGP) is a registered CDM project which comprises the landfill collection and combustion in enclosed flares only.

The project is currently in time for Renewal of the Crediting Period and since the PP has the opportunity to change the landfill gas plant configuration including, besides the landfill gas flaring:

- Delivering and selling part of the project landfill gas to a gas distribution network which is outside the project boundary and not defined in the registered Project Design Document.
- Electricity generation though the installation of generators that will combust the LFG to produce electricity, using part of the electricity for self consumption and the other part will be exported to the grid, which is also outside the project boundary and not defined in the registered Project Design Document.

We need a clarification on how those project plant changes should be carried out considering the Renewal of the Crediting Period.

The main question is:

1) Is it necessary to execute first the Renewal of the Crediting Period using the project plant configuration defined in the registered PDD (flaring only) and after that carry out a Post-Registration Changes?

2) Is it possible to include the changes in the landfill gas plant configuration during the Renewal of the Crediting Period process at once?

Yours faithfully,

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).

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

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat 14 February 2013

Reference number 2013-226-S

History of document

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**Business Function:** Governance