

	<b>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</b>
	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 Modalities and procedures for direct communication with stakeholders
Name of the stakeholder <sup>1</sup> submitting this form (individual/organization):	Hector Francisco Rangel Legarreta Managing Director, Biogas de Juarez S.A. de C.V.
Address and contact details of the individual submitting this form:	Address: Perif. Ortiz Mena # 3403 Plaza Quintas L-16 Col. Quintas del Sol Chihuahua, Chih., Mexico C.P. 31214 Telephone number: +52.614.430.0001 E-mail address: hector.rangel@biogasdejuarez.com
Title/Subject (give a short title or specify the subject of your submission)	Request for Support for Issuance of CERs for the CDM Project Activity 1123 Ciudad Juarez Gas to Energy Project
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)
Please choose any of the type(s) below <sup>3</sup> to describe the purpose of this submission.	
<input type="checkbox"/> <b>Type I:</b> <input type="checkbox"/> <b>Request for 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 type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input checked="" type="checkbox"/> Others. Please specify reference <a href="http://cdm.unfccc.int/Reference/index.html">CDM Related Ref: ICONTEC1356639960.96</a>  <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 describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

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

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

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

>> I refer to the latest request for issuance of CERs for the CDM project activity 1123 Ciudad Juarez Landfill Gas to Energy Project related to monitored period 1<sup>st</sup> August, 2010 to 15<sup>th</sup> December, 2012. The project is facing serious CERs delivery difficulties as a consequence of a request for review by three Board members that was raised at the period for requesting review. The deadline for CERs delivery to the final buyer and project participant, Japan Carbon Finance Ltd., is **31<sup>st</sup> December, 2013**.

A periodical verification was duly conducted by DOE ICONTEC in March, 2013. As a result, 20 findings were raised that consisted of 3 Corrective Action Requests (CARs) and 17 Clarifications (CL), which were dealt with by the project owner and clarified in a new version of the Monitoring Report. There was also a Post-registration change request in order to add the parameter "Operation Hours of the energy plant" to the registered PDD. The PRC was accepted by the CDM Secretariat in September, 2013 and a completeness check was scheduled according to the "Clean Development Mechanism Project Cycle Procedure version 4".

The Completeness Check and Information and Reporting Check were successfully completed and concluded; then, a period for requesting review started on 31 October, 2013, which led to the next issue raised in the request for review issued on 29<sup>th</sup> November, 2013.

*"The DOE is required to explain how it has verified the QA/QC procedures were correctly applied over the monitored parameters, as it was observed in the calculation spreadsheet that the amount of LFG measured reaches values above 2,000 Nm<sup>3</sup> for some records (such as on 30/11/2010 at 11:00AM and 12:00PM; 03/03/2011 at 2:PM and 3:PM; and on 05/05/2011 at 6:PM and 7:PM). In doing so, the DOE is required to validate the impact of these values on the calculation of ERs. Please refer to VVS v3.0, paragraph 234".*

In response to the request for review, the DOE submitted a letter on 2<sup>nd</sup> December, 2013, as follows:

*"During the onsite visit, the calibration certificates for each of the monitoring parameters, including the parameters related to "Total amount of LFG flared" (LFG<sub>flare</sub>) and "Total amount of LFG used in electricity generation" (LFG<sub>electricity</sub>), were verified. The abovementioned parameters correspond to LFG measured during the monitoring period of the project activity. The QA/QC process that was carried out during the verification is in accordance with the requirements set forth by methodology ACM0001, version 5 and the registered PDD; this QA/QC was defined as: "Flow meters are subject to a regular maintenance and testing regime to ensure accuracy".*

*During the onsite visit, ICONTEC checked the calibration records and certificates issued for the aforementioned flow meters, which are used in the monitoring of the landfill gas that is flared as well as the landfill gas used for electricity generation. ICONTEC did not find delays in the calibration frequencies or other issues that could potentially affect the flow meters performance and, in consequence, the measurement of reported values".*

*Furthermore, considering a hypothetical scenario in which the monitored values for landfill gas were incorrect, the following assessment was made by ICONTEC:*

*The values of LFG measured on 30/11/2010 at 11:00AM and 12:00PM; 03/03/2011 at 2:PM and 3:PM; and 05/05/2011 at 6:PM and 7:PM (i.e., the values mentioned in the request) were replaced by zero (as a conservative assumption) and the result obtained was a reduction of 143 tCO<sub>2e</sub>.*

*The obtained value of 143 tCO<sub>2e</sub> is lower than the materiality threshold value calculated initially for the Project, which is equal to 2,967 tCO<sub>2e</sub>. The PP as conservative approach changed the unusual values to zero and updated the resultant emission reductions. Thus, ICONTEC deems this error to be an immaterial error and determines that no additional audit procedures should be conducted in order to reach a reasonable level of assurance and the claimed emission reductions are free from material errors, omissions or misstatements."*

The corresponding response documentation and letter were submitted on 2<sup>nd</sup> December, 2013, under the following CDM-related reference: ICONTEC1356639960.96

The project participants understand that the request for review process has a specific timeline which is defined in PS and PCP, and that the timeline is followed by the Secretariat during the assessment.

However, taking into account the ERPA expiration date of 31<sup>st</sup> December, 2013, the project owner would like to kindly request that **an exception to this timeline be made**, such that the completeness check be undertaken as soon as possible in order to receive the answer by the Board and conclude the issuance process. **If issuance is delayed beyond the end of the year, the enormous efforts we have invested in the project to achieve the main objective will be irrevocably lost.**

Considering our assessment and the one made by the DOE, we are confident that the EB will be satisfied with the answer we have provided to the request and we expect a successful conclusion of this process.

*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).*

>> 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	10 December 2013
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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.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		