

 <p><b>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</b></p> <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 <sup>1</sup> submitting this form (individual/organization):	Mr. SKN Rao [Redacted]
Address and contact details of the individual submitting this form:	Address: 51, Banjara hills, Hyderabad, India  Telephone number: E-mail address:
Title/Subject (give a short title or specify the subject of your submission)	Additionality
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 checked="" 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                      (EB 62 Annex 5) <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference  <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> .

Dear Sir/Madam, We are a PP who has invested in a wind project of 31.5 MW (15 nos x 2.1 MW) capacity. During our board decision in end of March 2013, we have decided to go ahead with the wind project considering offered values by a Wind mill supplier (INR 50 Million/MW) and CDM benefits. Our Purchase order after negotiation was issued by end of April 2013 which was 48.5 Million/MW (reduction of 1.5 Million/MW or 3%). In the webhosted PDD, we have considered offered value as proejct cost in the investment analysis to prove additoanlity of the project. We showed that additionality holds true even with Purchase order values by the way of sensitivity analysis. After onsite visit by the validating DOE, they raised a CAR why Purchase order values are not considered (which is conservative) in the first place i.e in the investment analysis. We argued that purchase order values are not available to us at the time of investment decision (i.e our board meeting held in March 2013 and Purchase order values are available only in April). They did not agree. We, being helpless, changed the approach and used purchase order values in the investment analysis to prove additionality and provided the revised PDD to the DOE. After some time, the validation team was changed. Again the new team has raised a CAR why offered value which was as para 6 of the investment guidelines (EB 62 Annex 5) was not considered in the investment analysis. Now we are totally confused. Moreover, DOE is asking charging mandays each time which was fine as per our agreed terms. And our consultant is not helping now a days. But we are more worried whether our project will ultimately pass or not. We strongly believe the proving additoanlity is the purpose of investment analysis but not what values are being used. When the addianality holds good with the both values, why the rules are so strict that DOE could not move forward. Kindly consider this as a policy issue and consider all the issues raised in your next board meeting.	
<i>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).</i>	
>> Refer to the above table [replace this bracket with text, the field will expand automatically with size of text]	
<i>If necessary, list attached files containing relevant information (if any)</i>	Nil
<b>Section below to be filled in by UNFCCC secretariat</b>	
Date when the form was received at UNFCCC secretariat	15 July 2014
Reference number	2014-367-S, INQ-02079

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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		