



Stakeholder Communication Form
(Version 01.0)

This form shall be used for any CDM-related communication with the UNFCCC secretariat or the CDM Executive Board. All the questions are mandatory unless otherwise indicated.

The completed form and any supplemental documents shall be submitted electronically to cdm-info@unfccc.int, or via fax to +49-228-815-1999 or via post to: Sustainable Development Mechanism (SDM) Programme, UNFCCC secretariat, P.O. Box 260124, D-53153 Bonn, Germany.

SECTION 1: COMMUNICATION HEADER

Please provide your contact information.

Title: Mr. **First Name:** won-tae **Last Name:** Kim

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Country: Republic of Korea *Include country code (e.g. +49-228-815-1999)*

Stakeholder Type: CDM Coordinating/Managing Entity (CME) If other:

Please indicate from whom you would like to get an answer.

This communication is addressed to¹: Chair of CDM Executive Board (normal track)

SECTION 2: PROJECT ACTIVITY OR PROGRAMME OF ACTIVITIES (PoA)

If this communication refers to a specific CDM project activity/PoA, please answer questions in this section (otherwise proceed to Section 3).

Project/PoA Ref. Number 10014 If applicable, CPA Ref. Number:
5-digit# format 01234 *8-digit# format 0123-4567*

Project Cycle Stage Other If other: Post-registration

If there is no specific CDM Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).

Host Country(ies) Republic of Korea

Project/PoA Title The program to improve energy independence of public sewerage system through biogas increased efficiency in Korea

Technology Type Renewable energy If other:

SECTION 3: YOUR COMMUNICATION

Title/Subject
Maximum 250 characters Seeking guidance from the Board to change eligibility in PoA-DD, and asking clarification about actual data

Communication Text
Include background, details, and conclusion (unlimited length)

1. RE: Change of eligibility in PoA-DD

(1) Change of eligibility in generic CPA of PoA for new CPA inclusion

We are trying to include new CPAs which are similar to Project Scenario Option 1(Suppling heat to facilities through fuel substitution from fossil fuel to biogas by retrofit of existing heat generating facility) of the PoA-DD.

On Table 4 in B.2. Applicability of methodology(ies) of 'Part II. Generic component project activity

¹ In accordance with the "Procedure: Direct communication with stakeholders" (version 02.0), stakeholders may address communications either (a) to the secretariat, in order to seek a fast-track technical or operational explanation regarding the implementation of existing CDM rules, or (b) to the CDM Executive Board, in order to communicate to the Board their views on CDM rules and their implementation, or to seek official clarifications of CDM rules.

(CPA)' of the PoA-DD, it describes that new facilities and capacity additions are not applicable for CPA. But the new CPAs to be registered include capacity addition or new facility in heat generation. Except this, the new CPAs meet all the eligibilities described in the generic component project activity of PoA-DD. So, we would like to amend the eligibility on Table 4 in B.2. so that new CPAs can be included to this PoA.

But it seems that the eligibility needed to be changed is not referred to in paragraph 239(b) of 'CDM project standard for programmes of activities (Version 01.0)'. In this case, the standard(in para. 241) requests for CME to seek guidance from the Board on the appropriateness of the revision.

The details of the eligibility we would like to change are as follows:

Table 4. Applicability conditions of methodology AMS.I.C (page 17 of PoA-DD)

<Applicability Conditions>

New Facilities (Greenfield projects) and project activities involving capacity additions compared to the baseline scenario are only eligible if they comply with the related and relevant requirements in the General Guidelines to SSC CDM methodologies.

<Registered as below>

A CPA of Option 1 is not applicable.

<Needed to be changed as below>

The project activity can include new facilities or capacity additions. In that case, it will be demonstrated in CPA-DD that they are complying with the related and relevant requirements in the General Guidelines to SSC CDM methodologies.

It would be appreciated if the Board could provide guidance about our above request so that we can include the new CPAs to the PoA.

Meanwhile, is it possible to include the new CPAs without changing the above eligibility condition in the generic component project activity(PART II) because the new CPAs are already meeting all the eligibility criteria on Table 1(page 6 of PoA-DD) which is general requirements for inclusion of CPA, and because the new CPAs are fully complying with the applied methodology (AMS-I.C version 19) ? And, definitely, all details will be described in CPA-DD by complying with the methodology.

(2) Change of eligibility in PoA for included CPA

With regard to already included CPA(digit no. 10014-0001, Installation of co-generation systems in sewage treatment plant of Chuncheon) into above PoA, we would like to change the eligibility of CPA, but which is connected to an eligibility of PoA. So, we need to change the eligibility of PoA first. But, it seems that the eligibility needed to be changed in PoA is not referred to in paragraph 239(b) of 'CDM project standard for programmes of activities (Version 01.0)'. In this case, the standard(in paragraph 241) requests for CME to seek guidance from the Board on the appropriateness of the revision.

The eligibility details to be changed are as follows:

No. 11 of Table 1-Eligibility criteria for CPA inclusion (page 6 of the PoA)

<Registered as below>

Produced heat through this project should be provided to the anaerobic digester or the sewage sludge drying facility. Also, produced electricity should be used in the plant area.

<Needed to be changed as below>

Produced heat through this project should be provided to the anaerobic digester or the sewage sludge drying facility. Also, produced electricity can be used in the plant area or exported to the grid.

We recognized that above eligibility of PoA-DD must be an error from the beginning by considering following description of the PoA;

Page 5, fifth para.: "Electricity generated from the co-generation will be exported to the national grid and/or used on-site consumption. And this will be decided by detailed technical specification of the co-generation system which is provided in each CPA-DD"

Page 60, second para of B.3. Sources and GHGs: "Option 2: ~ Generated electricity from the co-generation will be exported to the national grid or used on-site consumption."

Page 79, first table of B.7.1. Data and parameters to be monitored by each generic CPA:

	<p>Description-Quantity of net electricity supplied to the grid and/or to the on-site as a result of the implementation of the CPA project activity in year y</p> <p>As shown in above description of PoA, this project allows the generated electricity not only to be used on-site of the plant but also to be exported to national grid.</p> <p>In addition, in paragraph 3 of the applied methodology AMS.I.C(ver 19), it allows project activity to supply electricity to a grid and/or use it for on-site consumption.</p> <p>Therefore, we would appreciate it if you could confirm that the eligibility of PoA (no. 11 article, page 6) can be changed so that CPA can export the generated electricity to a national grid as well.</p> <p>2. RE: Clarification about actual data</p> <p>One of our new CPAs that we are trying to include to the PoA is involving new renewable energy units. In this case, estimated thermal energy that would have been produced by existing units(installed before the project activity; EG thermal,old,y)) should be deducted from total actual thermal energy produced in year y by all units(EG thermal,pj,y), as stated in paragraph 37 of AMS.I.C. ver 19. And, estimated thermal energy that would have been produced by existing units(EG thermal,old,y) is determined by comparing between 'the actual, measured thermal energy production of the existing units(EG thermal,actual,y)' and 'the estimated thermal energy that would have been produced by the existing units(EG thermal,estimated,y)'. </p> <p>As the existing unit(a boiler producing steam; installed before the project activity) of our new CPA has used biogas from unaerobic digester, we are goint to deduct the EG thermal,old,y from EG thermal,pj,y. For the EG thermal,actual,y, we have not thermal data measured with calorimeters, but we have data of used biogas quantity(m3) for five years and concentration(%) of major components in the biogas including methane. So, we can get EG thermal,actual,y data by using the tool of ISO 6976 (Natural gas -- Calculation of calorific values, density, relative density and Wobbe indices from composition) which is widely used for calculating caloric values of natural gas. In addition, EG thermal,estimated,y will be higher than EG thermal,actual,y because we are going to calculate EG thermal,estimated,y very conservatively. From our conservative calculation, EG thermal,estimated,y is higher than EG thermal,actual,y by over 30%. Therefore, we can choose the EG thermal,estimated,y as EG thermal,old,y, finally.</p> <p>It would be appreciated if you could confirm that our above method to get EG thermal,old,y is acceptable, in our situation that the new CPA has not thermal data mesured with calorimeters before the project, but has data of used biogas quantity and concentraton of major components. For your reference, the CPA already finished construction and is operating the project facilities.</p>
<p>Supplemental Documents If applicable, list the title(s) of any attached file(s) or link(s)</p>	<p>N/A</p>
<p>This communication may be made public</p>	<p>Yes</p>

Document information

Version	Date	Description
01.0	02 March 2015	<p>This form supersedes and replaces the following:</p> <ul style="list-style-type: none"> • F-CDM-RtB: <i>Form for submission of Letters to the Board</i> (version 01.2) • F-CDM-RtB-DOE: <i>Form for communication on policy issues initiated by AEs/DOEs</i> (version 01.1) • CDM-RtB-DNA: <i>Form for communication on policy issues initiated by DNAs</i> (version 01.1)

<i>Version</i>	<i>Date</i>	<i>Description</i>
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