



To,
CDM Team
UNFCCC Secretariat

Sub: Response to UNFCCC I&R incompleteness queries – Request for issuance (Batch-1) the CDM PoA “CFL lighting scheme – “Bachat Lamp Yojana” ”(PoA-3223)

Clarification Raised by CDM Team-1:

The DOE is requested to further explain how it verified the project implementation in line with the VVS version 5 paragraphs 227 and 228. (a) The Monitoring Report page 5 states that the distribution of CFLs and replacement of previously used ICLs in households in the CPA area was also done through dedicated distribution points as advertised by the CPA investor in the local media. However the Verification Report page 17 only describes the CFLs being distributed on door to door distribution mode. Please kindly clarify and further explain how the DOE verified the CFLs that were distributed through dedicated distribution point; (b) Further information is requested as to why the DOE had not visited any households in CPA-0022 and CPA-0025, as indicated on page 19-20 of the Verification Report and how the implementation of these CPAs was verified.

Response from KBS:

- a) As per the implementation plan, the mode of CFL distribution was kept optional, either 1) by Door to Door or 2) through dedicated distribution Centre. The same was also mentioned in the section A.4.2 of registered PoA-DD and section A.2. of the respective CPA-DDs. Page number 5 of the monitoring report only explains the implementation status of the CPAs under the PoA according to the registered PoA-DD.

However, during verification on site visit, verification team has observed that, all the CPAs have considered option 2) i.e. distribution through dedicated center. The same was verified by the verification team by -

- Interviewing benefited households under the CPA
- By verifying the advertisement which was published in the local media
- By verifying leaflet or any other advertisement material used by the investor to inform local households prior and during the CFL distribution period
- By verifying agencies/individuals involved in the CFL distribution process

Thus, the verification team confirms that the requirements of the §227 of the VVS V5 has been met. During the on-site visit to each implemented CPA, verification team observed that all physical features of the project activity in the registered PoA-DD were in place and the project participants have operated the project activity as per the registered PoA-DD.

Verification team also confirms that there is no gap between the information stated in the registered PoA-DD and the monitoring report. Verification team also confirms that due to the CFL distribution mode carried out by CPA implementers, there will be no increase in emission estimation in this monitoring period. Since, there is no deviation from the declared implementation plan, verification team also confirms that requirements of the §228 of VVS V5 has been met by all the implemented CPAs under this monitoring period.

- b) CPA-0022 and CPA-0025 have been implemented by the investor *HPL Electric & Power Pvt. Limited*; it is mentioned in the monitoring report that the same investors have implemented seven



CPAs in the state of Karnataka under BESCO (Bangalore Electricity Supply Company). The same was verified by the data provided by the CME during the verification process. Verification team answered the clarification in two parts – first part clarifies, why previously site visit could not be undertaken and second part covers the results of the re-site visit conducted in response to this clarification.

Before on site visit, as per the accreditation standard, following the standard verification process, verification team had provided audit plan for on-site visit. The audit plan also covered the planned site visit to these 2 CPAs (CPA-0022 and CPA-0025) along with other CPAs in the region. However, the verification team was forced to abandon the site visit due to the then ongoing “Telangana Statehood Movement” prevailing in the project region. It is to be noted that the CPAs project region is close to the epicenter of this movement and can be seen from the following link -

<https://www.google.com/maps/place/India/@18.856364,78.918935,6z/data=!4m2!3m1!1s0x30635ff06b92b791:0xd78c4fa1854213a6?hl=en-US>

The detail about the movement can be referred from the following webpage - http://en.wikipedia.org/wiki/Telangana_movement.

The project regions of these two CPAs were also affected during this movement and can be verified from the various news clippings during the on-site visit period (October 2013). During this period there was road blockage as well as “strike by all section of people” were observed in the project region. The travel agency which was also helping the verification team during site visit has also declined travel arrangement and accommodation. The human resource department of HPL Electric & Power Pvt. Limited has also marked the region as highly sensitive zone before the proposed on site visit. Emails from the travel agencies as well as notifications from the HRs can be verified for the same. In view of the above, the verification team has cancelled the site visit in these two CPAs regions.

However, the in order to carry out a fair verification process, verification team had reviewed following documents-

- 1) Full Scale ICL Collection and Disposal Agreement signed between HPL Electric & Power Pvt. Ltd. and ECO Birdd Recycling Company Private Ltd. for each CPA.
- 2) Certificate of ICL Collection and Destruction issued by ICL Destruction Agency for each CPA.
- 3) Copy of the electronic database for each CPA containing list of each household that receives CFLs (Consumer number, house address, name of the occupant, DISCOM, date of distribution of CFLs, number & watt of each replaced ICL & each distributed CFLs) for each CPA
- 4) First ex-post monitoring survey reports determining monitoring parameters “ $Q_{PJ,i}$ ” and “ $LFR_{i,y}$ ” by Maverick Consulting for each CPA

Also, verification team conducted interviews with the CFL distribution team to understand the process of CFL distribution in both the CPAs.

DOE is also of the view that all the CPAs by the implementer are homogenous in nature and this can be confirmed by the following facts:

1. The geographical regions of all the 7 CPAs implemented by HPL are same and fall under the state of Karnataka.

2. The CFL distributed regions falls under the same DISCOM and has the same T&D loss value.
3. The mode of CFL distribution and the wattage of CFLs distributed are same.
4. All the implementation stages of these two CPAs are similar with that of other five CPAs of the same implementer and that was confirmed during the further site visit interview performed on 4th and 5th April 2014.

However, the verification team has now surveyed a total of 20 households in both the CPAs and re-verified the project implementation and monitoring with the registered CPA-DDs. Now, the site visit was possible as the region has come to normalcy and the situation is peaceful as the statehood movement was called off due to creation of a new state called “Telengana” by Govt. of India on 20th February 2014 when the upper house passed the resolution of Telengana state creation bill.

Verification team has visited 20 households during the second site visit conducted on 4/4/2014-5/4/2014 in order to physically verify the project implementation and correctness of monitoring plan in line to the registered PoA DD and respective CPA DDs. The followings have been observed during the second site visit and verification team confirms that the implementations of these two CPAs are also in line with the registered PoA-DD and CPA-DDs.

UNFCCC Reference Number	Total Households interviewed	No. of CFLs installed as per database		No. of ICLs replaced as per interview		No. of CFLs found as per interview		Success Rate as per DOE's interview
		11W	18W	60W	100W	11W	18W	
CPA-0022	10	8	32	8	32	7	27	11W: 87.50% 18W: 84.38%
CPA-0025	10	4	35	4	35	4	31	11W: 100% 18W: 88.57%

The assessment team hereby concludes that both the CPAs were implemented and operated as per the registered CPA-DDs. The results of the survey conducted by assessment team are given in the table above. Thus, as per the §234 of VVS V5, the verification team has verified the CPAs and confirms that there are no gap between the implemented plan and the plan mentioned in the registered PoA-DD and the individual CPA-DDs.

Thus as per §298 of VVS V5, the verification report has been revised and the necessary changes have been made.

Clarification-2 raised by CDM Team:

The DOE is requested to further explain how it concluded that the monitoring plan in the Annex 4 of PoA-DD and Annex 4 of CPA-DDs is line with the AMS-II.J version 3 paragraph 14(i) (i.e. "First ex post monitoring survey, carried out within the first year after installation of all efficient lighting equipment will provide a value for the number of lamps placed in service and operating under the project activity ..."), as the aforementioned documents describe that the survey is to be carried out within 12 months of the start of CFL distribution in SSC-CPA (e.g. PoA-DD page 51 and CPA-DD of CPA-0038 page 30), in particular for CPA-0038 where the survey was carried out during the distribution of the CFLs, whereas the applied methodology requires the survey being carried out within the first year after installation of all efficient lighting equipment.

Response from KBS:



The dates of 1st Ex post monitoring survey conducted for CPA 3223-0038 was wrongly mentioned as 12/10/2012 -23/10/2012 in the MR and VR. Verification team has now corrected the same based on the 1st Ex post monitoring survey report prepared by third party “Neosphere Ambiance Pvt. Ltd.”, which confirms that 1st Ex post monitoring survey conducted for CPA 3223-0038 dated 14/02/2013-23/02/2013. Based on this verification team confirms that, the First ex post monitoring survey, was carried out within the first year of completion date (i.e. 27/10/2012)of installation of all type of CFLs in CPA 3223-0038 region.

Clarification-3 Raised by CDM Team:

The DOE is requested to further explain how it verified the sampling/survey of CPA-0022 and CPA-0025 carried out by the CME in accordance with the Section 6 of the Standard for “Sampling and surveys for CDM project activities and programmes of activities” (version 04.1) paragraph, since the Verification Report pages 19-20 show that the DOE had not visited the households in CPA-0022 and CPA-0025.

Response from KBS:

The verification team has now surveyed a total of 20 households in both the CPAs during on site visit dated 04/04/2014-05/04/2014 and verified the sampling/survey of CPA-0022 and CPA-0025 in accordance with the methodology and registered CPA-DDs. The same has already been described in the response to the first clarification and necessary changes have been made in the verification report.

Clarification-4 raised by CDM Team:

The DOE is requested to further explain how it verified the following parameters in line with the VVS version 5 paragraph 234: (a) QPJ,i. In the Verification Report page 18 the DOE confirms the 90% level of confidence and with a 10% margin of error while determining the sample size for the monitoring survey by CPA implementers. However, the DOE has not confirmed whether the actual precision, based on the result of the sampling, has met the requirement in accordance with the paragraph 22(a) of Standard for “Sampling and surveys for CDM project activities and programmes of activities” (version 04.1); (b) TDy, using of the figure for year 2011-2012 for year 2012-2013 in CPA-0001, in particular how the DOE has verified the figure being the most recent from the website: <http://www.aperc.gov.in/>.

Response from KBS :

- a) The necessary changes have been made in the verification report. Now, verification report clearly describes the level of confidence/ precision achieved by the PP sampling survey.
- b) CPA number 3223-0001 is located in the state of Andhra Pradesh, and thus the DISCOMs operating in the state of Andhra Pradesh is being regulated by APERC. Although, the “Tariff Order” for 2012-13 has been published by the regulator dated 30/03/2012, before starting the verification of this monitoring period, but still the actual achieved T&D losses value cannot be verified from the same. It only contains projected value of T&D losses (refer Annexure E of the document) for the year 2012-13. The tariff order can be referred from: <http://www.aperc.gov.in/TariffOrders/Orders/2012/TO2012-13EAI.pdf>

Also, the “Tariff Order” for 2013-14 has been published by the regulator dated 30/03/2013, before starting the verification of this monitoring period, but still the actual achieved T&D losses value for year 2012-13 cannot be verified from the same. It only contains projected value of T&D losses



(refer Annexure G of the document) for the year 2013-14. The tariff order can be referred from:
http://www.aperc.gov.in/TariffOrders/Orders/2013/Tariff_Order_2013_14%20with%20acronyms%20&%20index.pdf

The CPA region falls under the Central Power Distribution Company of Andhra Pradesh Limited (APCPDCL) and thus in the absence of generic tariff order investor has considered the year 2011-12 APERC approved actual achieved T&D losses value for the concerned DISCOM, which can be referred from page 36 of the following order:
<http://www.aperc.gov.in/TariffOrders/ARR/ARRfillingsFY2012-13/APCPDCLARRFilingforFY2012-13.pdf>

Also, the projected figure T&D losses for year 2011-12 in the similar type of tariff order dated 30/03/2011 (<http://www.aperc.gov.in/TariffOrders/ORDER2011-12%20anexure%20a-l.pdf>) has projected T&D loss value of 16.61% which is lesser than the actual achieved T&D loss value of 17.96% as mentioned in the above referred order. Hence, the verification team is in view that approved figures are more appropriate than the projected figure as mentioned in the latest available tariff orders at the time of verification.

Thanks & Best Regards;
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Manager T&C