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Date
11.11.2016

Response to Incompleteness Notification regarding the Request for Registration/Issuance of project "Scaling-Up Solar Photovoltaic Power Generation", (UNFCCC Ref. no. 10320), notification received on 09/11/2016.

Dear CDM team,

Please find below the response of the TÜV NORD JI/CDM Certification Program to the request for registration incomplete for the above mentioned project.

Yours sincerely,

TÜV NORD JI/CDM Certification Program

Rainer Winter

Request for Registration/Issuance Incomplete Reason (1)	
Scope and Issue raised by the UNFCCC	Only one generic CPA was developed for the two methodologies applied (AMS I.D and ACM0002), the DOE has concluded one generic CPA-DD is required as per paragraph 269 of the VVS version 09.0. However, paragraph 269 of VVS version 9 and paragraph 209 of PS version 9 require a generic CPA for each methodology

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Secretariat:	and each combination thereof. Therefore, the DOE is requested to provide information on how it has concluded the compliance of only one generic CPA with paragraph 209 of PS version 9 and paragraph 269 of VVS version 9, considering that the PoA has applied two methodologies and CPAs will applied either of the two methodologies (i.e. page 16 of PoA-DD)
Response by PP:	In accordance with §207 of the PS, we are unable to combine two methodologies into one generic CPA. In reality, the only future CPA that we expected would be less than 15MW is now not going to proceed. Therefore, we have removed any reference to the second methodology from the PoA-DD, the generic CPA and the 3 x specific case CPAs, as per attached in our submission.
Response by DOE:	The applied small scale methodology AMS-I.D, version 18 has been removed from the PoA and all relevant sections of the PoA-DD and the generic CPA-DD, as well as the final validation report have been revised
Request for Registration/Issuance Incomplete Reason (2)	
Scope and Issue raised by the UNFCCC Secretariat:	For the specific CPAs, the approaches of calculating grid emission factor are not described consistently or not specified. For example, for CPA-0001, (a) page 20 of the CPA-DD states that both grid and off-grid plants are included in the project electricity system, whereas table "Step 2 Off-grid" of the ER sheet states not using off-grid due to the availability of data; and (b) for the calculation of simple OM, neither the CPA-DD (page 21) nor the ER sheet has specified the option to be applied to determine EF _{EL,m,y} (i.e. CO ₂ emission factor of power unit m in year y). The DOE is requested to provide information on how it has validated the compliance of grid emission factor calculation with the applied approaches/options in a step-wise approach, for each submitted CPA. Please refer to paragraph 141 of VVS version 9, and the methodological Tool "Tool to calculate the emission factor for an electricity system" version 05.0.
Response by PP:	We have removed the sentence from the "Step2 Off-Grid" tab of each ER spreadsheet that says "not using off-grid due to the availability of data" to make it consistent with each submitted real case CPA-DD. In terms of the option to determine EF _{EL,m,y} (i.e. CO ₂ emission factor of power unit m in year y), we chose to use option A.1, equation 4 in accordance with §47 of the 'Tool to calculate the emission factor for an electricity system – version 05.0'. The revised excel sheets have been submitted together with the revised 3 x CPA-DDs.
Response by DOE:	The sentence in Tab 'Step 2 Off-Grid' has been revised and now consistent with Step 2 (option II) of the tool where both off-grid and grid power plants are included in the calculation. In the calculation of Simple OM, the PP has now indicated in all real-case CPA-DDs that Option A1 (equation 4) of the tool has been selected for the determination of EF _{EL,m,y} . The same is deemed to be correct and consistent with the spreadsheets furnished to DOE
Request for Registration/Issuance Incomplete Reason (3)	
Scope and	For the data sources used to calculate grid emission factor, the DOE did not

Issue raised by the UNFCCC Secretariat:	provide information on how it has validated the compliance of the data sources with the applied tool. For example, for the determination of simple OM of CPA-0001, the data is obtained from the UNFCCC Regional Collaboration Centre; however, page 29 of the “Tool to calculate the emission factor for an electricity system” version 05.0 requires data from utility or government records or official publications.
Response by PP:	We have updated all the real case CPA-DDs to highlight that the data was obtained from utility or government records or official publications via the UNFCCC regional collaboration centre (RCC). These amendments have also been included in the new CPA-DDs as per attached in our submission.
Response by DOE:	<p>The grid data applied in the calculations of ex-ante grid emission factor for each CPA was obtained from the UNFCCC regional collaboration centre in Togo. The data was sourced from publicly available data of the state utilities, and was cross-checked by the DOE as follows:-</p> <p>20MW Ningo PV Power Generation Project in Ghana:</p> <p>Emission factor data for each power unit was also obtained directly during DOE on site visit from the official of Energy Commission of Ghana. This data was used by the validation team mainly for comparison purposes. Further, the validation team conducted direct interviews with the officials who also confirmed the authenticity of the data. No discrepancy in the RCC data was found when cross-checked</p> <p>17MWp Zagtoulé PV Power Generation Project in Burkina Faso:</p> <p>The data applied in the calculations was cross-checked with SONABEL officials, which is the state utility in the host country. Data obtained was cross-checked with data obtained from RCC which was used in the calculations, and similar projects currently undergoing validation</p> <p>33MWp Segou PV Power Generation Project in Mali:</p> <p>The data provided by the UNFCCC regional collaboration centre was cross-checked with the data obtained during onsite of a CDM project utilizing the same methodology recently. The data had been sourced directly from the state utility EDM</p> <p>Section D.6.3 of the CPA-DDs and section D.5.3 of the CPA validation reports have been updated accordingly</p>
Request for Registration/Issuance Incomplete Reason (4)	
Scope and Issue raised by the UNFCCC Secretariat:	The equation in page 22 of the PoA-DD is not readable.

Response by PP:	The formatting issue has been resolved and the equation on page 22 of the PoA-DD is now readable.
Response by DOE:	The formatting error is now resolved and the equation is now readable
Request for Registration/Issuance Incomplete Reason (5)	
Scope and Issue raised by the UNFCCC Secretariat:	Two methodologies (i.e. AMS I.D version 18 and ACM0002 version 16) are to be applied in CPAs below 15MW and CPAs above 15MW respectively, whereas only ACM0002 is included in the PoA view page.
Response by DOE:	The PoA documents have been revised. Only one methodology is applied: ACM0002: Grid-connected electricity generation from renewable sources, Version 16.0.