



Dated: 16th December 2016

Dear CDM Team (UNFCCC Secretariat),

e-mail: CDMRegistration@unfccc.int

Reference: Request for registration of the proposed programme of activities incomplete for "Small Hydro Power Programme of Activities in Iran" - Ref No. 00010307

Carbon Check (India) Private Ltd., (CC IPL) acknowledges the comments raised during Information & Reporting Check of Request for Registration (RfR) for the CDM PoA "Small Hydro Power Programme of Activities in Iran" - Ref No. 00010307

As part of our response, CPA-DDs, IRR spread-sheet and the validation reports (VRs) have been appropriately revised.

Issue No.	Issue raised by UNFCCC via mail dated 03/11/2016	CME's Response	DOE Assessment
1.	The PoA-DD indicates that "EIA will be conducted at the CPA level", and that if the capacity is less than 100 MW [Σ] the environmental impact analysis could be optionally done by the CPA owner. However, the CPA-DDs of the included CPAs do not contain an analysis of the environmental impacts of the proposed CDM project activity or PoA, including transboundary impacts, as required by PS, paragraph 72. Further, the validation report does not contain information on whether the project participants or the coordinating/managing entity conducted an analysis of the environmental impacts of the proposed CDM PoA	<p>Environment impact analysis was done by projects owner. We added sentences related to results of this analysis in all CPA-DD in section B.1. Also, in this section, we described why the CPA does not have any transboundary impacts.</p> <p>The original environment impact analysis documents have been submitted to DOE.</p>	<p>The validation team reviewed the PoA-DD, the CPA-DDs and the environment impact analysis reports for Ardal package (which includes Absardeh, Azizabad and Doplan hydro power plants) and Solehdokal hydro power plants to confirm that CME has conducted an environmental impact analysis, including analysis of trans-boundary impacts of the proposed project activity. Based on the same the validation team concludes that:</p> <ul style="list-style-type: none"> • There are no significant negative impacts associated with the proposed project activity. In fact, the project activity will have an overall positive effect on the environment and social wellbeing of the region and the host country as a whole. Moreover, as applicable, the CME will also seek methods to minimise any negative impacts arising from the project activity. • As the CPA is located downstream to the river and the river itself only flows within the host country of Iran there shall be no trans-boundary impact associated with the project activity.

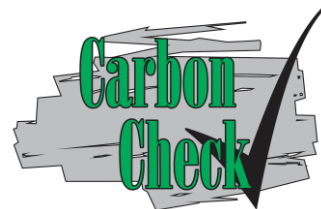
CARBON CHECK (INDIA) PRIVATE LIMITED

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	and/or CPA. Please refer to VVS ver09 para 157.		<p>This was further confirmed upon conducting interviews with representatives of representatives of CME and CPA implementer and performing visual inspection during OSV as well as studying google maps of the host country.</p> <p>The validation reports have been edited to provide the above confirmation and corresponding assessment.</p>
2.	<p>In the submitted IRR spreadsheets for Azizabad and Doplan CPAs, it appears that the cumulative depreciation reaches a higher value than the total project cost, which leads to a negative salvage value being discounted from the cash flow at the end of the assessment period. However, the DOE (page 26 of the respective validation reports) validated that the PP has considered positive salvage values of 41,094 and 77,278 million Iranian Rials (respectively). The PP/DOE are requested to clarify this inconsistency.</p>	<p>There was a mistake in IRR spreadsheets and related CPA-DDs. Actually, salvage value would be zero in year 27 of project life time (for both Douplan and Azizabad). Since every sectors of projects (equipment, civil and electricity transfer and substation) have a different life time, project owner used average formula to calculate depreciation rate that causes salvage value be zero in year 27.</p> <p>IRR Sheets and CPA-DDs have been revised accordingly.</p>	<p>The validation team reviewed the revised CPA-DDs and the corresponding ER sheets and confirms that the cumulative depreciation rate equals the total project cost during 27th year of project operation. Thus, the salvage value would be equal to zero. CME has used the Straight Line Depreciation method to calculate the salvage value. This is deemed appropriate to the validation team.</p> <p>The CPA validation reports have been rectified to reflect the above. This measure is deemed appropriate to the validation and is further in conformance to the requirements of §129 of VVS (version 09).</p>

We believe that the above response and revised documents adequately address the issues raised during Information & Reporting Check. Carbon Check (India) Pvt Ltd., therefore requests you to kindly approve the Request for Registration (RfR) for the CDM PoA "Small Hydro Power Programme of Activities in Iran"

In case of any further query, the undersigned shall be responsible for answering and can be reached via the contact details provided below.

Kind regards

(Amit Anand)
Team Leader

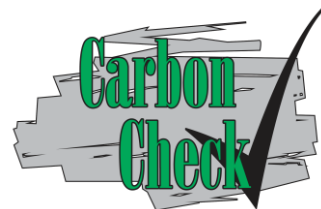
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Reference documents attached:

DDs:

1. Revised PoA-DD in Track Change (SHP Iran_PoA-DD_TC.pdf)
2. Revised PoA-DD in Clean (SHP Iran_PoA-DD_Clean.pdf)
3. Revised CPA-DD (Absardeh) in Track Change (Absardeh-CPA-DD_TC.pdf)
4. Revised CPA-DD (Absardeh) in Clean (Absardeh-CPA-DD_Clean.pdf)
5. Revised CPA-DD (Azizabad) in Track Change (Azizabad-CPA-DD_TC.pdf)
6. Revised CPA-DD (Azizabad) in Clean (Azizabad-CPA-DD_Clean.pdf)
7. Revised CPA-DD (Doplan) in Track Change (Doplan-CPA-DD_TC.pdf)
8. Revised CPA-DD (Doplan) in Clean (Doplan-CPA-DD_Clean.pdf)
9. Revised CPA-DD (Solehdokal) in Track Change (Solehdokal-CPA-DD_TC.pdf)
10. Revised CPA-DD (Solehdokal) in Clean (Solehdokal-CPA-DD_Clean.pdf)

FVRs:

11. Revised PoA FVR in Track Change (CC IPL 382_PoA FVR_tc.pdf)
12. Revised PoA FVR in Clean (CC IPL 382_PoA FVR_clean.pdf)
13. Revised CPA FVR (Absardeh) in Track Change (CC IPL 382_FVR_CPA-Absardeh_tc.pdf)
14. Revised CPA FVR (Absardeh) in Clean (CC IPL 382_FVR_CPA-Absardeh_clean.pdf)
15. Revised CPA FVR (Azizabad) in Track Change (CC IPL 382_FVR_CPA-Azizabad_tc.pdf)
16. Revised CPA FVR (Azizabad) in Clean (CC IPL 382_FVR_CPA-Azizabad_clean.pdf)
17. Revised CPA FVR (Doplan) in Track Change (CC IPL 382_FVR_CPA-Doplan_tc.pdf)
18. Revised CPA FVR (Doplan) in Clean (CC IPL 382_FVR_CPA-Doplan_clean.pdf)
19. Revised CPA FVR (Solehdokal) in Track Change (CC IPL 382_FVR_CPA-Solehdokal_tc.pdf)
20. Revised CPA FVR (Solehdokal) in Clean (CC IPL 382_FVR_CPA-Solehdokal_clean.pdf)

IRR spreadsheets:

21. Revised IRR spreadsheet (Azizabad) (IRR Azizabad-10.xlsx)
22. Revised IRR spreadsheet (Doplan) (IRR Doplan-10.xlsx)

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