

	CDM: Response form for Request for revision of approved methodologies (version 01.1)
<i>Date of Meth Panel meeting:</i>	15 - 19 January 2007
<i>Title and number of Request for revision</i>	Application of ACM0009 to fuel switching from designed/planned fossil fuel fired industrial processes, and application of ACM0009 to projects where the baseline fuel is producer gas derived from coal / AM_REV_0034
Summary of the query:	
Please use the space below to summarize the request for revision on the related approved methodologies.	
<p>The query involves the extension of ACM0009 to new equipment instead of fuel switching in existent equipment. Furthermore, gas from coal gasifier (producer gas) is included as one possible baseline fuel.</p>	
Recommendation by the Meth Panel:	
(a) Please use the space below to provide amendments /changes (in your expert view, if necessary).	
<p>Not to accept the request for revision.</p> <p>ACM0009 is applicable to project activities that switch in one or several element processes from an existing plant from coal or petroleum fuel to natural gas. It is not clear from the new revised methodology from which point a planned facility can be considered as “existent” deserving the same analysis approach (i.e. neglecting the need for a technological analysis regarding type of equipment and technology adopted).</p> <p>The following conditions apply to the current version of ACM0009:</p> <ul style="list-style-type: none"> • Prior to the implementation of the project activity, only coal or petroleum fuel (but not natural gas) have been used in the element processes; • Regulations/programs do not constrain the facility from using the fossil fuels being used prior to fuel switching; • Regulations do not require the use of natural gas or any other fuel in the element processes; • The project activity does not increase the capacity of thermal output or lifetime of the element processes during the crediting period (i.e. emission reductions are only accounted up to the end of the lifetime of the relevant element process), nor is there any thermal capacity expansion planned for the project facility during the crediting period; • The proposed project activity does not result in integrated process change; 	

The methodology cannot be expanded to new equipment (facilities) without structural modifications including removal of some of the applicability conditions currently adopted (e.g. Prior to the implementation of the project activity, only coal or petroleum fuel - but not natural gas - have been used in the element processes). Furthermore, additional baseline scenario options should be included, not limited to different types of fuels but also to different equipment technologies for its use as well. Project Proponents should provide a method to assess from different technological and fuel options for baseline equipments (e.g. boilers, process heaters or gasifiers) which combination is the most likely to be implemented.

The addition of a new baseline fuel is acceptable but for this specific case (coal gas produced in a gasifier) more information is needed regarding its producing process and associated emissions that should be included in calculations as components of baseline emissions. The proposed revision is excessively conservative since it considers the efficiency of conversion from coal to gas as 100% and additionally neglects emissions due to the gasification process (steam and electricity). Nothing is said regarding the sensible heat associated with the coal gas (if the gas is cooled prior to its use this energy may be lost). This information should be considered not only during baseline emissions assessment but also when selecting the baseline scenario. A more detailed cost analysis associated with that option might confirm natural gas based technology as the baseline. Real data from existent facilities should be included to improve the robustness of the analysis. Once information regarding emissions estimation for this new baseline fuel is complemented, the inclusion of producer gas as a baseline fuel can be incorporated in current version of ACM0009.

(b) Please use the space below for providing guidance, as per Para 93 of EB25 Report, on what type of projects need to revise the PDD as a consequence of the suggested revision, if the recommendation is to revise the methodology.

Not applicable.

Answer to authors of the request for revision by the Meth Panel :

Please use the space below to provide an answer to the authors of the above query

1. The request for revision expands the applicability of the methodology to new equipments. The text provided to include them is considered insufficient and incomplete. Additional guidance to determine the baseline scenario should be provided since current version of the methodology is clearly restricted to fuel switch projects in existent equipment (applicability condition). The baseline selection section of ACM0009 currently does not take into account this possibility. It is not clear from the new revised methodology from which point a planned facility can be considered as "existent" deserving the same analysis approach (i.e. neglecting the need for a technological analysis regarding type of equipment and technology adopted).
2. More information regarding the new baseline fuel is needed. A coal gasifier involves the use of electricity and steam consumption for its production and both are produced with GHG generation. These elements should be translated into equations to be added to the current methodology. The overall emissions associated with coal gas production and consumption (baseline emissions) may be greater than the one for coal. Being excessively conservative when determining baseline emissions is not appropriate since this may have impact on baseline scenario selection (costs associated with this alternative may be underestimated). Real data from existent facilities adopting the use of producer gas should be included to improve the robustness of the analysis.
3. Once information regarding baseline emissions estimation for this new baseline fuel is complemented, the inclusion of producer gas as a baseline fuel can be incorporated in the current version of ACM0009.



Signature of the Meth Panel Chair

Date: 25/01/07

(Rajesh Sethi)



Signature of the Meth Panel Vice-Chair

Date: 25/01/07

(Jean-Jacques Becker)

Information to be completed by the secretariat

F-CDM-AM	AM-REV-0032
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