



**CDM: Response form for request for clarification on
Approved Methodologies
(version 01.1)**

<i>Date of Meth Panel meeting:</i>	15 - 19 August 2011
<i>Title and number of request for clarification</i>	Application of AM0035 in case data does not exist enough AM_CLA_0213

Summary of the query:

Please use the space below to summarize the request for clarification on the related approved methodologies.

This request for clarification refers to AM0035 “SF₆ Emission Reduction in Electrical Grids”. The project activity is planning to reduce SF₆ emissions through the introduction of a recovery equipment.

Although the activity of utility operation and management has been conducted normally up to date, there is not enough data for baseline emission calculation using the three years prior to the start of the project activity. Under this situation, the following option provided in the methodology will be used:

“In cases where three years of data do not exist, the project developer will need to demonstrate that the data does not exist and explain the steps being taken to ensure that the baseline year data is not being manipulated. This would likely include a detailed description of normal operating practices over the past three year period and a detailed description of activities using the order of magnitude test described in the ‘Linkage Between Project Activities and Emission Reduction Results’ section.”

The request for clarification seeks guidance on whether the following options may be used in case three years data do not exist:

Option 1. To reduce the period of data collection for baseline

If project participants (hereinafter PP) submit a description of normal operating practices over the past three year period to the DOE to prove that the SF₆ utilities have been operated in normal conditions, and if PP submit one year's full data, that is going to be accumulated from now on, DOE presumes that the one year's full data will represent the emissions of the past years before the implementation of project activity, so the one year can be a baseline year and that year's emissions will be used as baseline emissions.

The full data includes:

Dix - Decrease in inventory in the baseline year (only cylinders; from beginning of baseline year until end; number can be negative. This is expressed as “cylinders at the beginning of the year less that at the end of the year in the inventory.”),

Aix - Additions to Inventory in baseline year (cylinder purchases, recycled SF₆ returned to inventory (captured from retiring equipment) and any SF₆ included in new equipment fully charged by manufacturer),

Six - Subtractions from inventory in baseline year (only cylinders; sold back to supplier, or sent for recycling),

RECx - Retired Equipment Capacity expressed as nameplate capacity of retired equipment ,

NECx - New Equipment Capacity expressed as nameplate capacity of new equipment.

Option 2. New procedure to calculate baseline emissions

To calculate baseline emissions, full data DIx, AIx, SIx, RECx and NECx within project boundary is required. There is data for NECx, RECx and SF₆ purchase for the past three years but DIx does not exist

since cylinder inventory has not been managed until now. In this case, DOE presumes that it is possible to calculate baseline emissions as follows:

If there is no internal and external leakage, following equation is applicable with regard to cylinder inventory:

Ending inventory = Beginning inventory + purchase quantity - injection quantity

DIx (beginning inventory - ending inventory) = injection quantity - purchase quantity

As the purchase converges into injection quantity, DIx becomes zero.

By employing above-mentioned method, calculation for baseline emissions for the project is possible.

Further, explanation on "a detailed description of normal operating practices" as mentioned in the methodology will be helpful to implement the project.

Recommendation by the Meth Panel:

Please use the space below to provide amendments /changes (in your expert view, if necessary).

Not applicable.

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

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

The Meth Panel noted that the current version of methodology AM0035 contains provisions on how to apply methodology in cases where three years of data do not exist. These provisions may require further development in order to make them fully operational for all types of projects. The Meth Panel appreciates that PPs have drawn the Panel's attention to this issue.

The Meth Panel clarified that the methodology AM0035 ver. 1.0 is applicable also in case data for baseline emissions calculation do not exist for the entire three years period prior to the start of the project as per option provided in the footnote 2. The Meth Panel is of the opinion that a DOE should validate application of the footnote in circumstances specific for the project based on detailed information provided in the PDD. However, the Meth Panel agreed to initiate the revision of the methodology with aim to provide a general guidance on how to apply it in case data for baseline emissions calculation do not exist for the entire three years period prior to the start of the project. The PPs may wish to consider submission of a request for revision of AM0035 ver. 1.0 in order to provide information possibly allowing the revised version of the methodology to address the particular circumstances of the project referred to in the current request for clarification.

Signed by the Chair, Mr. Philip Gwage

Date: 19/08/2011

Signed by the Vice-Chair, Mr. Lex de Jonge

Date: 19/08/2011

Information to be completed by the secretariat

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