



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

<i>Date of Meth Panel meeting:</i>	15 - 19 October 2012
<i>Title and number of request for clarification</i>	Applicability of methodology to the project plants (Clinker Production) which exist at the time of validation but having less than 3 years of operating data AM_CLA_0237

Summary of the query:

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

The approved consolidated methodology ACM0003 version 07.4.1 is applicable to project activities in the cement or quicklime industry where fossil fuel(s) in an existing clinker or quicklime production facility are partially replaced by less carbon intensive fossil fuel(s) and/or alternative fuel(s).

Clarification is requested whether the methodology can be applied to a production facility of M/s Zuari Cement Limited with two similar production lines (hereafter referred as Line 1 and Line 2).

Line 1 of the clinker production facility has more than three years of historical data at the time of the start date of project activity, while Line 2 clinker production facility was commissioned on 30th March 2010 and has less than the required three years of historical data.

Partial use of biomass residues (alternative fuel) is already proposed for both Line 1 and Line 2, and a “alternative fuel feeding system” is already commissioned in Line 2 as on 25th August 2011.

Clarifications are sought on the following issues:

1. Since Line 2 was recently commissioned, it is not possible to satisfy the methodological conditions related to equations (10), (11) and (13) in terms of three years data for clinker production and heat generation from fuel usage. Thus, to satisfy these methodological conditions and to determine baseline emissions, the project proponent seeks clarification whether it is possible to use the clinker production and heat generation data of Line 1 for Line 2 as well.
2. Line 2 facility would not be able to satisfy the applicability condition that specifies “during the last three years prior to the start date of the project activity, no alternative fuels have been used in the project plant”, as Line 2 does not have three years of data for the pre-project scenario. Hence, the project proponent seeks clarification whether it is possible to use the historical fuel usage of the existing Line 1 to satisfy the applicability condition for Line 2 as well.

The above is proposed by the PP given that both production lines are located with the same manufacturing facility of the PP with similar set of control parameters and under the same facility management authority.

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 would like to clarify that the project proponent can use: (i) the yearly aggregate data (i.e. the last three years for Line 1 and the corresponding latest one year data for Line 2 or whatever data is available for that corresponding year) to calculate the baseline emissions and to satisfy the methodological conditions related to equations (10), (11) and (13); and (ii) the historical fuel usage of the existing Line 1 to satisfy the applicability condition for Line 2 provided that the following can be demonstrated:

1. Line 2 was commissioned prior to the start date of the project activity;
2. Line 2 is not designed as an integrated kiln with the alternative fuel feeding system commissioned simultaneously (i.e. decision to install the alternative fuel feeding system was taken after commissioning of Clinker Line 2);
3. Both Line 1 and Line 2 are able to demonstrate that current practice and/or continuation of using only fossil fuels and no alternative fuels has been the same for their entire period of operation; and
4. Both Line 1 and Line 2 are part of the same project plant as described by the approved methodology.

Signed by the Chair, Mr. Thomas Bernheim

Date: 19/10/2012

Signed by the Vice-Chair, Mr. Hugh Sealy

Date: 19/10/2012

Information to be completed by the secretariat

F-CDM-AM	AM_CLA_0237
Name of the authors of the query:	BUREAU VERITAS CERTIFICATION HOLDING SAS
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