



CDM: Response form for Request for revision of approved methodologies (version 01.1)

<i>Date of Meth Panel meeting:</i>	14 – 18 September 2009
<i>Title and number of Request for revision</i>	Emission factor moving average EF _{ma} AM_REV_0164
Summary of the query:	
Please use the space below to summarize the request for revision on the related approved methodologies.	
<p>Each project campaign results in a campaign emission factor EF_n (formula 4) For each new project campaign a moving average factor EF_{ma} is calculated. EF_{ma} includes all preceding campaigns (formula 5)</p> <p>Circumstances can occur that result in high EF_n. This can be catalyst poisoning, cracks in the reactor holding the abatement catalyst, etc. The higher than usual EF_n increase the EF_{ma} and therefore the EF_p.</p> <p>The inclusion of exceptional campaigns in EF_{ma} leads to an emission factor that does not represent the overall trend in EF_n. The emission reductions calculated this way do not bear any relation to the emission reductions that were actually achieved. The approach leads therefore to a calculated emission reduction that is not representative, not precise and not reflecting the long term emission trend. The approach is also not conservative, as there is no uncertainty regarding values of variables and parameters in the baseline; the calculated EF_n reflects the actual emission reductions better than the EF_{ma}.</p> <p>In view hereof, a revision of the methodology is proposed that excludes campaigns from the moving average that are clearly and evidently not representative of the long term trend of EF_n as envisaged in the methodology.</p>	
Recommendation by the Meth Panel:	
(a) Please use the space below to provide amendments /changes (in your expert view, if necessary).	
<p>The existing methodology already defines “abnormal campaigns” in the section on “Baseline emissions” for the situations where all data that fall within the upper and lower 2.5% percentiles of the sample distribution. The text introduced in the draft revision could lead to misinterpretations because it provides a different definition for abnormal campaigns. A different denomination should be used.</p> <p>The text added into the methodology does not provide a clear procedure explaining what shall be done in case of an abnormal project campaign (not to update EF_{ma}?) Moreover, it is not clear why a campaign shall be considered as abnormal when the abatement efficiency is more than 10% lower than the forecasted PDD. Why the value of 10% is chosen and, why is the expected value in the PDD used as a reference? The Meth Panel is of the view that it would be more appropriate to use real data corresponding to the operation of the plant like the current value for EF_{ma}</p> <p>Finally it is not clear from the text added in the methodology if the determination of an abnormal campaign is only based on the 10% threshold or if other requirements are to be met (i.e. corresponding to some technical circumstances to be certified by a third party).</p> <p>The PP is invited to clarify the issues outlined above.</p>	

(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.

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

The recommendation is not to revise the methodology. Project proponents could submit a new revision taking into account the above recommendation.



Signature of Meth Panel Chair

Date: 18/09/2009

(Philip Gwage)



Signature of Meth Panel Vice-Chair

Date: 18/09/2009

(Pedro Martins Barata)

Information to be completed by the secretariat

F-CDM-AM	AM_REV_0164
Name of the authors of the query:	DNV
Date when the form was received at UNFCCC secretariat	18 September 2009
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