



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

<i>Date of Meth Panel meeting:</i>	23 - 27 January 2012
<i>Title and number of Request for revision</i>	Revision of project emissions calculation AM_REV_0227

Summary of the query:

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

(1) Revision of project emissions for secondary abatement

In ACM0019, baseline emissions are determined from a conservative default N₂O emission factor ($EF_{\text{default},y}$), baseline emissions are thus fixed irrespective of actual baseline emissions. Project emissions, in turn, are monitored and reflect actual emissions during the monitoring period. As a consequence, whenever the abatement system underperforms the default baseline emission factor, the resulting calculated emission reductions could be negative, when in fact they should be zero. In case of tertiary abatement systems the methodology includes provisions that prevent that from happening. However, in case of secondary abatement systems, that is not the case. The request seeks to revise the calculation of project emissions in case of secondary abatement systems in order to prevent calculated emissions reductions from being negative, consistently with the results for tertiary abatement.

- (i) Firstly, the operation of a secondary abatement system does not increase N₂O emissions as compared to the situation where the abatement system is not installed. Therefore, actual project emissions after the installation and operation of a secondary abatement system are not higher than actual baseline emissions. At most the system would not abate N₂O emissions, so that actual project emissions would equal actual baseline emissions, hence emissions reductions would be zero;
- (ii) Moreover, depending on the level of actual baseline emissions the impact of those potential negative emission reductions could be high enough for projects to remain some years without any generation of CERs which could cause project participants to abandon the project activity, foregoing real emissions reductions (considering that only costs, and no other source of revenue, accrues from the project operation);
- (iii) Furthermore, the default N₂O emission factor ($EF_{\text{default},y}$) in ACM0019 entails a high level of ambition. As a consequence actual baseline emissions for many nitric acid plants tend to be above calculated baseline emissions. Calculated emission reductions thus tend to underestimate actual emission reductions, which represents an insurance pool of actual emission reductions which are not claimed;
- (iv) Finally, as mentioned before, the methodology allows for emission reductions to be corrected if a tertiary abatement system is not functional. This is accomplished by the parameter $Q_{N_2O,by\ pass,n}$. The proposed revision extends this approach to secondary abatement systems.

(2) Amendment to the conditions of application of the gas flow tool in the methodology

The revision also proposes to include an additional condition of application of the “Tool to determine the mass flow of a greenhouse gas in a gaseous stream”. The additional condition aims to clarify, in line with the tool, that the parameters P_t and T_t are not needed when the N₂O concentration and the volume or mass flow of the tail gas are automatically converted to normal conditions by the AMS during the monitoring process.

Recommendation by the Meth Panel:	
(a) Please use the space below to provide amendments /changes (in your expert view, if necessary).	
Not applicable.	
(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	
<p>The Meth Panel recommends to partially incorporate the issues raised by the project proponents into the methodology.</p> <ul style="list-style-type: none"> Emission reductions could be considered zero when there is no abatement system working or when it underperforms. The panel considers that each of those events that lead to negative emission reductions could have a maximum length of 2 consecutive days and they can occur in a total of 7 days over a year period. Clarify in the methodology that there is no need to monitor temperature and pressure of the gas when the AMS provides the information of flow and concentration in normal conditions <p>The draft revised methodology is annexed to the fifty-fourth Meth Panel report.</p>	
<p>Signed by the Chair, Mr. Philip Gwage Date: 27/01/2012</p> <p>Signed by the Vice-Chair, Mr. Lex de Jonge Date: 27/01/2012</p>	
Information to be completed by the secretariat	
F-CDM-AM	AM_REV_0227
Name of the authors of the query:	DNV
Date when the form was received at UNFCCC secretariat	27 January 2012
Date of transmission to the EB	27 January 2012
Date of posting in the UNFCCC CDM web site	27 January 2012