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

Date of Meth Panel meeting:	26–30 March 2012
Title and number of request for clarification	Clarification for ACM 0018 Version 01.3.0 AM_CLA_0225

Summary of the query:

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

The DOE refers to Version 1.3.0 of ACM0018 "Consolidated methodology for electricity generation from biomass residues in power-only plants".

The proposed project activity involves the implementation of a biomass-fired power plant through the installation of two new high-pressure boilers and a turbo-generator, while thermal heat required by the refinery on-site would be provided by an existing biomass boiler operating at a lower pressure.

Furthermore, on-site are two fossil fuel fired boilers supplying steam at the same lower pressure. These are not expected to be used in the project scenario. However, the two pressure headers are connected in an unspecified manner, and are expected to interact under the following situations:

- During start-up, for de-aeration of one boiler, steam from the other boiler would be used;
- During start-up, steam from the existing biomass boiler would be used for pre-heating the project boilers;
- During emergencies, steam from the project boilers would be sent to the refinery as process heat, in case of failure with the existing biomass boiler.

Furthermore, in the past the project boiler has been used to provide steam to the refinery. This occurred during the project boilers' start-up and testing phase, in order to avoid energy waste by releasing steam to the atmosphere.

The DOE recognises that the methodology is applicable for power-only plants. However, it further points out article 7 of the applicability criteria, which states that if any heat which is used for purposes other than power generation (e.g. heat which is produced in boilers or extracted from the header to feed thermal loads in the process) is generated during the crediting period or was generated prior to the implementation of the project activity, by any on-site or off-site heat generation equipment connected to the project site, three conditions apply. Addressing the three conditions in article 7:

(a) *The implementation of the project activity does not influence directly or indirectly the operation of the heat generation equipment* - The existing biomass boiler operates just as it did prior to the project activity, delivering steam to the refinery;

(b) *The heat generation equipment does not influence directly or indirectly the operation of the project plant* - The existing biomass boiler steam generation is at 26 Bar pressure, which is not able to be used in the electricity generation system operating at 60 Bar in the project activity;

(c) *The amount of fuel used in the heat generation equipment can be monitored and clearly differentiated from any fuel used in the project activity* - The amount of biomass burned in the existing biomass boiler is the same as before the project activity, the system for feeding biomass to the existing boiler is completely separate and the biomass is delivered separately to each use.

The DOE seeks out clarification regarding whether the methodology is applicable for the project as described above, despite the connections between the power only plant and the existing heat plant, for practical reasons, during start-up and emergency situations.

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 the following:

- De-aeration and pre-heating are technical constraints of the power plant equipment, and are not considered a thermal application. Therefore, such utilization of steam is in agreement with the applicability criteria;
- Supply of steam from project boilers to the refinery during the testing phase is not relevant as the methodology refers to what happens during the crediting period, which presumably starts only after the boiler is commissioned, after the testing phase etc;
- Use of steam from project boilers for thermal applications during emergencies is allowed, as this is not considered normal operation of the heat generation equipment. The PPs are required to monitor whether steam is transferred from project boilers to the refinery as process heat, and if this occurs and an emergency cannot be demonstrated, a deviation from the approved methodology shall be requested.

Signed by the Chair, Mr. Thomas Bernheim
Date: 30/03/2012

Signed by the Vice-Chair, Mr. Hugh Sealy
Date: 30/03/2012

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