CDM: Recommendation Form for Small Scale Methodologies (version 01)

(To be used for presenting questions/proposals/amendments to the simplified methodologies for small-scale CDM project activity categories)

Date of SSC WG meeting:	22–25 August 2011, SSC WG 33
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Clarification on the combined use of the mutually exclusive methodologies AMS-I.A and AMS-I.F in one PDD
Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.	AMS-I.A "Electricity generation by the user" AMS-I.F "Renewable electricity generation for captive use and mini-grid"
Name of the authors of the query:	Kyoko Tochikawa Institution: Carbon Partners Asiatica kyoko.tochikawa@cp-asiatica.com

Summary of the query:

Please use the space below to summarize the query related to SSC methodologies/categories SSC Modalities and Procedures provide recommendation/analysis of the SSC WG.

Original text from PP

We wish to request for clarification on the combined use of AMS-I.A and AMS-I.F in the one PDD. The background and clarification request is elaborated below.

1. The background

   The project for which this request is made has the following characteristics:

   a. The CDM project involves wastewater biogas power generation ("Project"). The project site (i.e. the host mill site) is not connected to the grid. Power demands for the host mill site are currently met by a combination of diesel power generation and renewable biomass cogeneration.

   b. In Phase I of the Project, biogas will be used to firstly displace captive diesel power generation. As the project site is NOT connected to the grid under Phase I, the balance of the biogas will then be fed to the existing biomass boiler for cogeneration[1]. This phase of the Project is fully compliant with AMS-I.A.

   c. Phase II of the Project also involves displacement of captive diesel power generation, which remains the priority. However, Phase II will involve diverting the balance of biogas for grid power generation, and as part of this phase the project site will be newly connected to the grid. This phase of the Project is fully compliant with AMS-I.F.

   d. As way of explanation of b. and c. above, it is noted that the circumstances in the Project's host country power sector is such that it is not viable for Phase II to be implemented in the short term.

[1] While the biogas is fed to the biomass boiler for cogeneration, it does not lead to baseline or project emissions and is outside of the project boundary as regards the CER calculations. Hence, the restriction on cogeneration as stipulated in paragraph 3 of AMS-I.A does not apply.

2. The clarification request

At the recommendation of the validating DOE, clarification is sought on whether AMS-I.A and AMS-I.F can be used in one PDD. The concern is that the following statements in the respective methodologies make them mutually exclusive, calling into question whether they can be used in the one PDD.

- AMS-I.A Version 14.0 Paragraph 1: "This category comprises renewable electricity generation units that supply individual households/users or groups of households/users included in the project boundary. The applicability is limited to individual households and users that do not have a grid connection…"
- AMS-I.F Version 2.0 Paragraph 1: "This methodology comprises renewable energy generation units, such as photovoltaic, hydro, tidal/wave, wind, geothermal and renewable biomass that supply electricity to user(s). The project activity will displace electricity from an electricity distribution system that is or would have been supplied by at least one fossil fuel fired generating unit i.e. in the absence of the project activity, the users would have been supplied electricity from one or more sources listed below:

  (a) A national or a regional grid (grid hereafter);

  (b) Fossil fuel fired captive power plant [Footnote 1: Where the users of the captive electricity are also connected to the grid in the project site.];

  (c) A carbon intensive mini-grid."

It is our belief that as the Project will use only AMS-I.A or AMS-I.F at any one time, and will not use both at the same time, it is possible to use the two seemingly mutually exclusive methodologies.

The SSCWG's guidance on this matter will be very much appreciated.

Recommendation by the SSC WG:

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

Please refer to paragraph 35 of the meeting report of the SSC WG 33 <http://cdm.unfccc.int/Panels/ssc_wg>.

Answer to authors of query by the SSC WG:

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

The small-scale working group of the CDM Executive Board would like to thank the author for the submission.

Based on the limited information provided in the query, the SSC WG is of the opinion that the proposed project activity could face the following situations during the crediting period:

- Change in the measure/technology of the project during the crediting period, due to grid-connection;
- Accordingly, the switch of the applicable methodology during the crediting period, and then changes in the monitoring plan, emission reduction calculations, etc.

The SSC WG is of the view that the PDD has to be prepared covering the project that will be implemented using AMS-I.A.

If the methodology used at the time of PDD registration is no longer applicable due to the changes in circumstances during the crediting period, the project participant should follow the relevant procedures specified for these cases for example:

- Guidelines on assessment of different types of changes from the project activity as described in the registered PDD (EB 48, version 1); <http://cdm.unfccc.int/Reference/Guidclarif/iss/iss_guid03.pdf>;
- Procedures for notifying and requesting approval of changes from the project activity as described in the registered PDD (EB 48, version 1) <http://cdm.unfccc.int/Reference/Procedures/iss_proc06.pdf>;
- Procedures for revising monitoring plans in accordance with paragraph 57 of the modalities and procedures for the CDM (EB 49, version 1) <http://cdm.unfccc.int/Reference/Procedures/iss_proc05.pdf>.

Signed by the Chair, Ms. Fatou Gaye

Date: 25/08/2011

Signed by the Vice-Chair, Mr. Peer Stiansen

Date: 25/08/2011

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