 CDM: Response form for Request for revision of approved methodologies (version 01.1)	
<i>Date of Meth Panel meeting:</i>	12 - 16 November 2007
<i>Title and number of Request for revision</i>	AM0025 ver 09: Addition of an alternative baseline scenario - disposal of the waste at a landfill after incineration without electricity generation AM_REV_0066
Summary of the query: Please use the space below to summarize the request for revision on the related approved methodologies.	
<p>The request is to expand the applicability of the approved methodology to project activities that use municipal solid waste (MSW), which in absence of the project activity would have been incinerated without the recovery of the waste heat from the incinerator. The project would be to use the waste heat from the incinerator to generate electricity.</p> <p>The proposed project activity is located in Singapore, where more than 90% of the MSW is incinerated, though it is not clear if this is due to regulatory requirement or not. Further, the following points are important to note:</p> <ul style="list-style-type: none"> (i) The proposed waste based electricity generation project replaces an existing electricity generation facility that was installed in 1979. It is not clear if there are other electricity generation plants that use MSW to generate electricity in the country. Though it states in the PDD (page 12 under step 3) “.....waste incineration plant with power generation has a long history in Singapore, including Tuas South Incineration Plant that is located next to the proposed project activity.” (ii) The project proponents states in the PDD that due to change in market regulation for electricity providers to the grid (since 2003 the electricity is purchased by the grid dispatcher based on competitive bidding), the project would not be done in absence of the CDM benefits, as it would not be profitable. It also states in the PDD that “The primary method for proving additionality would be the investment analysis, ...”. Though the PDD does not report data on investment analysis but only speaks of investment barrier. 	
Recommendation by the Meth Panel: (a) Please use the space below to provide amendments /changes (in your expert view, if necessary).	
<p>The core of AM0025 is the avoided methane emissions from avoided landfilling of waste. The energy components of the methodology were added due to the fact that energy can be generated as a result of treatment technologies of the waste. The proposed project activity is to utilize the waste heat from the incinerator to generate electricity, which in the absence of the project would be wasted. The project activity results in reduction emissions from electricity in the baseline. Methane emissions are not avoided as a result of this type of project activity.</p> <p>The project proponents may consider proposing a revision to ACM0012 (“Consolidated baseline methodology for GHG emission reductions for waste gas or waste heat or waste pressure based energy system” is applicable to cases where the waste heat in the baseline is utilized in the project activity to generate electricity and/or thermal energy. The methodology ACM0012 is more rigorous in the treatment of the baseline of the waste gas / waste energy (the baseline of the waste gas / waste energy is not included in AM0025). Also, ACM0012 contains the option that allows the application of the methodology in case the baseline is cogeneration, which would result in a wider applicability for projects where the energy from incinerators displace electricity and heat that are co-generated in the baseline. Further, ACM0012 provides for procedures for estimating caps for baseline emissions for existing plants, which would be needed in case the methodology is applied to existing incinerators that do not utilize the waste heat.</p>	

Therefore, the Meth Panel recommends not to approve this request for revision

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

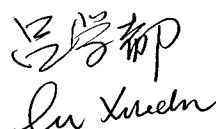
The Meth Panel recommends not approve the request for revision for the above mentioned reasons. The project proponents may consider submitting a revision to ACM0012 which is applicable to cases where the waste heat in the baseline is utilized in the project activity to generate electricity and/or thermal energy.



Signature of Meth Panel Chair

Date: 16/11/2007

(Akihiro Kuroki)



Signature of Meth Panel Vice-Chair

Date: 16/11/2007

(Xuedu Lu)

Information to be completed by the secretariat

F-CDM-AM	AM_REV_0066
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