



**Approved baseline and monitoring methodology /  
methodological tool clarification response form  
(Version 02.0)**

**INFORMATION TO BE COMPLETED BY THE SECRETARIAT OR PANEL / WG**

<b>Date and number of Panel / WG meeting:</b>	23–25 March 2015 / SSC WG 47
<b>Title/Subject of the request for clarification:</b>	Applicability of methodology AMS-II.D version 13 to Automotive Coating Process
<b>Reference number of the request for clarification:</b>	SSC_716
<b>Exact reference (number, title and version) of the methodology or methodological tool to which the request for clarification applies:</b>	AMS-II.D Energy efficiency and fuel switching measures for industrial facilities --- Version 13.0
<b>Fast track or Regular track:</b>	<input type="checkbox"/> Fast track <input checked="" type="checkbox"/> Regular track

**Summary of the request for clarification**

**Original text from DOE:**

The Project Activity “Improving Energy Efficiency by Replacing an Automotive Coating Process” first requested its registration on 21/March/2014 and closed all issues raised during the completeness check. According to TN evaluation, the project met all applicability criteria of AMS II.D version 12 and no issues were raised about this during this first completeness check.

When resubmitted for the next completeness check the project missed the grace period of the methodology AMS II.D. version 12.

As version 13 of AMS-II.D modified substantially the methodology, expanding and detailing all sections, we would like to seek clarification whether it can be determined that the Project Activity still complies with all applicability requirements of AMS-II.D in its new version 13 and may apply AMS-II.D v13 as it is. Please find enclosed the last version of the PDD that went through the second completeness check, where there is a detailed description of baseline and project scenarios.

The PP seeks clarification regarding 4 specific points:

**Clarification Point #1**

From AMS II.D, version 13:

**2.1. Scope**

***2. This methodology comprises any energy efficiency improvement measures implemented at a single or several industrial or mining and mineral production facilities. The project activities may involve:***

***(a) Process energy efficiency improvement(s) affecting either a single production step/element process1 (e.g. furnace, kiln) or a series of production steps/element processes (e.g. industrial process involving many machines) that transform(s) raw materials (e.g. feed-stocks) and other inputs into either intermediate forms or final finished outputs (e.g. molten metal, tiles, steel ingots);***

***(b) Energy efficiency improvement in energy conversion equipment (e.g. boiler, motor) that supplies energy (thermal/electrical/mechanical) within a facility.***

The scope of the methodology comprises any energy efficiency improvement measures, although the examples given in the methodology items (a) and (b) do not cite the Energy efficiency improvements in an Automotive Coating Process. In a car manufacturing process, the automotive coating step is a complex industrial process involving many machines. During the process, the raw material (paint) passes through physical and chemical transformation using thermal energy (drying ovens), the liquid material (paint) is transformed into a solid material (coating) applied on the car body (final finished output). The project in frame consists of an improvement in the car painting process, by means of change in the raw material

(paint) allowing elimination of one cabin (used for primer application) and therefore resulting in a more energy efficient process compared to the baseline, rather than changing or substituting one equipment by a more efficient one.

The Project Proponent seeks your guidance as to whether the Project Activity remains within the scope of AMS-II.D v13 as defined in 2(a), above.

### **Clarification Point #2**

From AMS II.D, version 13:

#### **2.2. Applicability**

**7. This category is applicable to project activities where the impact of the measures implemented (improvements in energy efficiency) by the project activity can be clearly accounted for and documented as well as distinguished from changes in energy use due to other independent variables not influenced by the project activity (signal to noise ratio).**

**Examples of other variables include upstream/downstream process factors, feedstock and product characteristics, and environmental parameters (e.g. ambient temperature, humidity) associated with the baseline or project activity that may influence the energy savings from the project activity.**

As described above, the new paint being applied dismisses applying a primer beforehand. We understand that this new paint is not an independent variable as referred by in this condition. We would like to confirm this understanding.

For the sake of conservativeness, PP proposes to add a monitoring parameter related to the average quantity of paint applied per area as a proxy for the paint quality and adjusted ER volume accordingly. We seek confirmation whether this approach is acceptable.

### **Clarification Point #3**

From AMS II.D, version 13:

#### **2.2. Applicability**

**8. In the case where the independent variables mentioned above may have an impact on emissions reduction greater than approximately five per cent of the total annual emission reduction, then:**

- a) the project boundary shall be extended to cover all such processes that influence the energy savings from project activity; and**
- b) such independent variables shall be monitored and taken into account in the emissions reduction calculations. Documentation of an assessment of all variables that may be reasonably expected to potentially affect emission reductions calculations shall be included in the project design document.**

Once more, our understanding is that the new paint is not an independent variable and so, not subject to this condition.

The new paint is the reason for 100% of the emissions reductions. Before initial submission of project to completeness check, PP submitted to DOE a formal declaration from the paint manufacturer stating that the emissions associated with new paint did not generate more emissions in the manufacturing process or upstream compared to the traditional paint used in conjunction with primer process.

Once more, for the sake of conservativeness, PP proposes to add an annual declaration from the paint providers stating that emissions associated with paint manufacturing throughout the crediting period are not higher than emissions of traditional paint. We would like to confirm this approach is acceptable.

### **Clarification Point #4**

From AMS II.D, version 13:

#### **2.2. Applicability**

**12. The type of input materials used in the project shall be homogeneous and similar to the input material that was used in the baseline and any deviation during the crediting period of input material type, composition, or amount used per unit of product output shall be within the range that does not cause a change in energy consumption per unit of output beyond  $\pm 10$  per cent of the baseline characteristics and values**

The difference in input materials in the baseline and proposed project activity is that in the baseline there is primer + traditional automotive paint and for the project activity there is a chemically different paint and the

primer is no longer applied. Project Proponent seeks your guidance as to whether it can be considered that the input materials are similar in the sense that they achieve the same result, i.e. a painted car body with same appearance and durability.

#### Clarification by the secretariat or Panel / WG

The small-scale working group (SSC WG) would like to thank the author for the submission.

The SSC WG is of the opinion the applied methodology AMS-II.D is not applicable to the project activity where savings accrue from intrinsic changes in industrial processes and not from improved energy efficiency measures, which is the case for the underlying project activity of this submission. The underlying project activity involves changes to the raw material used in the baseline, elimination of unit operation and change in technology.

SSC WG noted that AMS-II.D is neither intended to cover implementation of energy efficiency measures that shall affect the nature of industrial/production processes as compared to the baseline processes, nor is it intended for project activities that involve changes to raw material used, unit operations, and type and quality of product output.

The SSC WG also noted that a similar clarification has been issued for a project activity of a similar nature sought by this clarification request and to which the submitting author may wish to refer to (see previously issued clarification SSC\_489).

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#### Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
02.0	18 July 2013	Revised to remove the row "Date and signature of the chair and vice chair of Panel/WG (in case of clarification by Panel/WG)"
01.0	4 July 2013	Initial publication. This document supersedes and replaces the following documents: <ul style="list-style-type: none"> <li>• Recommendation Form for Small Scale Methodologies (F-CDM-SSCwg) (Version 01.1)</li> <li>• Recommendation Form for Small Scale A/R Methodologies and Procedures (F-CDM-SSC-AR) (Version 01.1)</li> </ul>
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