



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)

<i>Date of SSC WG meeting:</i>	30 June–2 July 2008, SSC WG 16
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Applicability of AMS II.D for a energy efficiency project which installs modern kiln with a six-stage preheater instead of a five stage pre-heater (baseline scenario)
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMS II.D version 11
<i>Name of the authors of the query:</i>	Alexander Röder / Abraham Garza Institution: CEMEX alexander.roeder@cemex.com , agarza@co2-solutions.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.	
<p>The proposed SSC project activity involves installing an efficient cement kiln with six-stage pre-heater instead of a five-stage pre-heater (baseline scenario). The project developer seeks clarification whether the technology providers' certification of energy savings per unit of clinker production originated from a six-stage pre-heater instead of a five-stage pre-heater is acceptable without actual monitored data for the five-stage pre-heater with the same clinker production capacity and operation conditions, and that this saving is verified and reviewed through theoretical analysis based on energy balances and raw meal humidity levels.</p> <p>The query is in the context of the guidance in the approved methodology AMS II.D that states "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 distinguished from changes in energy use due to other variables not influenced by the project activity (signal to noise ratio)".</p>	
Recommendation by the SSC WG:	
Please use the space below to provide amendments/change (in your expert view, if necessary).	
Please refer to paragraph 30 of the meeting report of the SSC WG 16 (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	
<p>The small-scale working group (SSC WG) of the CDM Executive Board would like to thank the author for the submission.</p> <p>The SSC WG appreciated the author of the submission for theoretical analysis explaining that energy saving parameter provided by the technology supplier is constant and there is no influence of external</p>	

factors on the estimated energy savings (signal to noise). The SSC WG is of the opinion that the explanation provided by the author is based on theoretical basis and is not a sound basis to assess whether the emissions reduction due to the project activity is real and verifiable. The major concerns/issues the SSC WG 14 had reflected in previous clarification (see SSC_150) still remain.

The SSC WG is also of the opinion that if installation of a five stage pre-heater was the baseline scenario and considering the prevalence of cement kilns it should be possible to obtain energy consumption data for kilns that represent the baseline scenario. This may also be required to establish that a five-stage pre-heater is common practice and hence the baseline scenario. Even if the similarities are not identical, it is suggested to conservatively estimate the energy consumption of a reasonably similar kiln with five-stage pre-heater based on national or industry data. Therefore the technology provider's certification of energy savings per unit of clinker production cannot be considered as the baseline.



Signature of SSC WG Chair

(Ulrika Raab)

Date: 02/07/2008



Signature of SSC WG Vice-Chair

(Kamel Djemouai)

Date: 02/07/2008

Information to be completed by the secretariat

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