



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)

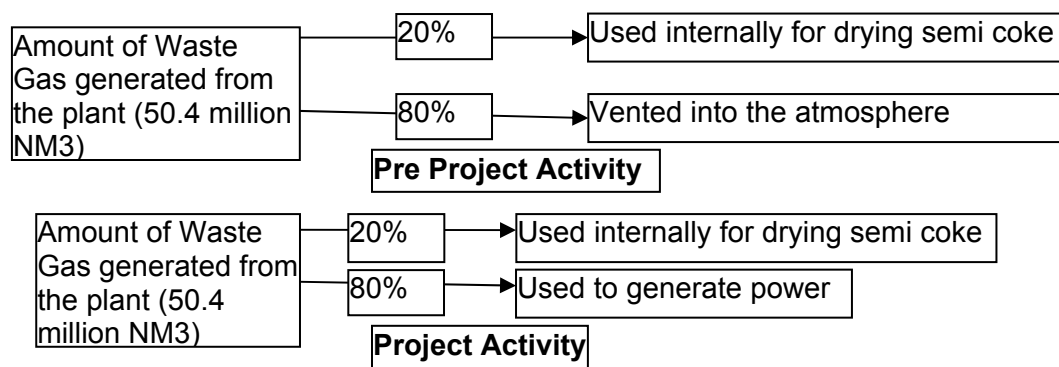
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| Date of SSC WG meeting: | 19–22 October 2010, SSC WG 28 |
| Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters): | Clarification on the applicability of AMS-III.Q to an enhanced waste heat recovery project |
| Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable. | AMS-III.Q “Waste Energy Recovery (gas/heat/pressure) Projects” |
| Name of the authors of the query: | Arundhati Ghosh Institution: Sharyn Gol Energy LLC Mongolia arundhati.ghosh@carbonmcgroup.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 Stakeholder:

The project activity is described by following diagram



Pre Project Activity: About 50.4 Million Nm³ waste gas is generated from the semi coke oven plant. About 20% of it is used internally for drying the semi coke and the rest (80% of it) is vented into the atmosphere.

Project Activity: In the project activity the same 50.4 million Nm³ of gas will be generated from the semi coke oven plant. Among which 20% will still be used internally for drying the semi coke and the rest (80%) will be utilized to generate power.

Clarification Required:

In the pre-project activity 80% of the waste gas was emitted into the atmosphere whereas the same quantity of the waste is going to be used to generate power. The project activity is being developed under guidance of AMS IIIQ version 03. Therefore, it is required to be clarified whether AMS IIIQ version 03 is applicable using ACM 0012 version 03.2 type II equation to calculate the emission reductions. In PP's understanding Para 4 in AMS IIIQ version 03 allows this situation.

The semi-coke plant has only been operating since June 2010 and the purchase order of the waste heat recovery equipment is yet to be made. Hence, the project complies with the footnote 1 in AMS IIIQ version 03. Does, however, the methodology require any minimum operational period (example: x years) for the waste gas generation facility?

It is required to be clarified why the below mentioned procedure available in ACM 0012 version 3.2 under the headline of “demonstration of use of waste energy in absence of CDM project activity” on page no 5 is excluded in AMS IIIQ version 03. ACM 0012 version 3.2 allows the use of on site checks conducted by the DOE prior to project implementation to confirm that no equipment for waste energy recovery and utilization is installed prior to the implementation of the CDM project activity. Is it required to follow only steps available in AMS IIIQ version 03 paragraph 6(g) to establish the state of waste gas in the baseline or is it also possible to use the step under the headline of “demonstration of use of waste energy in absence of CDM project activity” on page no 5 in ACM 0012 version 3.2. If SSC-WG decides not to allow a DOE visit as a proof of states of waste gas in the baseline, we would be grateful if the rationale for the same can be provided.

As per start date of the project activity, it may not possible to have historical information on the waste gas, but by the time the project activity is implemented, about one year of data will be available. Clarification is required whether f_{cap} can be calculated following Method 3 case 1 in ACM 0012 version 03.2. I.e. f_{cap} is the ratio of maximum theoretical energy recoverable using the project activity waste heat recovery equipment and actual energy recovered under the project activity.

Recommendation by the SSC WG:

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

Please refer to paragraph 28 of the meeting report of the SSC WG 28
<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.

The SSC WG agreed to clarify as follows:

Query 1: Whether enhanced heat recovery project activity is applicable under AMS-III.Q “Waste Energy Recovery (gas/heat/pressure) Projects” version 3 and Type II equation of ACM0012 “Consolidated baseline methodology for GHG emission reductions from waste energy recovery projects” version 03.2 for the same can be used for determining baseline emissions?

As stated in the methodology, incremental gain in an existing practice is covered in the methodology. A revision of the methodology could be proposed, in order to include correspondent equations, e.g. the ones included in ACM0012 for Type II. The project proponent also may follow the progress on the ongoing revision of ACM0012 by the Meth Panel.

Query 2: Does the methodology require any minimum operational period for the waste gas generation facility? As per start date of the project activity, it may not be possible to have historical information on the waste gas, but by the time the project activity is implemented, about one year of data will be available.

The methodology includes requirements of historical information (e.g. for the use of the waste gas in the absence of the project or to determine f_{cap}). All the historical information required shall be available for validation.

Query 3: ACM0012 version 3.2 has a provision of on site checks conducted by the DOE prior to project implementation to confirm that no equipment for waste energy recovery and utilization is installed prior to the implementation of the CDM project activity. Why this is not required in AMS-III.Q?

The provision included in ACM0012 for on site check by DOE is additional to the other provisions (direct measurement, energy bill, process plant manufacturer). The SSC WG considered that it may not be mandatory in the context of SSC project activities.

The submissions also states “The project complies with the footnote 1 in AMS-III.Q version 03. The semi-coke plant has only been operating since June 2010 and the purchase order of the waste heat recovery equipment is yet to be made.” The SSC WG did not see a need to evaluate the correctness or otherwise of this statement in view of the responses provided to the three substantive queries presented above.

Signed by the Chair, Mr. Peer Stiansen

Date: 22/10/2010

Signed by the Vice-Chair, Mr. Hugh Sealy

Date: 22/10/2010

Information to be completed by the secretariat

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| SSC-Submission number | SSC_477 |
| Date when the form was received at UNFCCC secretariat | 22 October 2010 |
| Date of transmission to the EB | 22 October 2010 |
| Date of posting in the UNFCCC CDM web site | 22 October 2010 |