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Att: CDM Executive Board

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XUEYJ/MLEH

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QUESTIONS RAISED BY CDM EXECUTIVE BOARD MEMBERS	RESPONSE SUMMARY FROM DNV	ACTION TAKEN (IF RELEVANT)
<p>Q1 The PP/DOE are requested to describe how the project activity meets the requirements of paragraph 22 (a) of AMS-III.B. version 14; in particular, how the monitoring plan ensures that all the emission reductions are claimed due to the fuel switching measure and not on account of any other measures (such as increase in efficiency, etc).</p>	<p>As per the Para.123 of VVM, DNV has applied a two-step process to assess the compliance of monitoring plan contained in the updated PDD with the requirements of paragraph 22 (a) of AMS-III.B. version 14.</p> <p>a) <i>Compliance of the monitoring plan with the applied methodology</i></p> <p>The parameters required by the paragraph 22(a) of selected methodology have been identified in the PDD. DNV confirms that they are clearly described and that the means of monitoring described in the plan complies with the requirements of the methodology. $Q_{PJ,y}$ will be monitored in terms of production of glassware (in tonnes) in year y while AMS-III.B stipulates to monitor net energy output in the project activity in year y (please refer to below assessment for further details on this).</p> <p>b) <i>Implementation of monitoring plan</i></p> <p>(i) The monitoring arrangements described in the monitoring plan are verified to be feasible within the project design by the means of documentation review.</p> <p>(ii) The means of implementation of the monitoring plan, are considered as sufficient to ensure that the emission reductions achieved by the proposed CDM project activity can be reported ex post and verified. It can also be validated by the review of documentation and the interview with the relevant personnel.</p> <p>(iii) The monitoring plan is verified to have ensured that all the emission reductions are claimed due to the fuel switching measure and not on account of any other measures (such as increase in efficiency etc.).</p>	<p>More description to assess the compliance of the monitoring plan contained in the updated PDD with the paragraph 22 (a) of AMS-III.B version 14 has been included in the validation report.</p> <p>The PDD was updated to include more detailed information regarding the monitoring of FC_y and $Q_{PJ,y}$ and addressed the claimed emission reductions are due to the fuel switch and not on account of other measures.</p>

	<p>The structure, volume and the melting area of glass kilns remain consistent, and the melting percentage and melting point in temperature stay unchanged after the fuel switching, which has built the constant operational circumstance. Under the same operation conditions, the heat output from the same element process can be monitored by measuring the quantity of energy carrier (i.e. produced glass). The difference in quantity between the liquid glass and solid glassware is negligible (the transferrable ratio from liquid glass to solid glassware is 98% and unaffected by the fuel switch).</p> <p>And the heat output generated in one glass facility is not able to be directly measured since its medium is in the form of liquid glass, which makes the monitoring of glass production become necessary.</p> <p>Furthermore, the thermal efficiency of glass kiln is reflected as the energy consumption per unit of glass production instead of being based on the heat output according to the relevant sectoral information. The thermal efficiency will be higher if the energy consumption per unit of glass production is lower. Therefore, the monitoring of net quantity of glassware production as proxy of the heat output is selected.</p> <p>The efficiency improvement in the baseline scenario and project scenario within the same system, under the same operating conditions, is validated to be attributed to the switching of fuel as the system using the various fuel types will result in the different efficiencies. The difference of energy efficiency for the proposed project activity due to the variation of fuel type is verified to be reasonable and consistent with the reference of <i>Energy Efficiency & Industrial Boiler Efficiency</i>. Thus, it is DNV's opinion that the efficiency improvement observed following the implementing the project are attributable to the fuel switch only and are not attributed to any other efficiency improvement which could result in a higher glassware output.</p> <p>The monitoring of $Q_{PJ,y}$ allows to check whether the other measures besides switch of energy sources have affected the determination of baseline emissions. The stability of glassware production before/after the fuel switch has reasonably demonstrated that the determination of baseline emissions was not affected by other measures apart from the fuel switch.</p> <p>The monitoring of FC_y and NCV allows the validation team to check whether the determination of project emissions is affected by other measures apart from the fuel switch. The quantity of natural gas consumed by the project</p>	
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	<p>activity is limited by the demand of glassware production. Once the amount of glassware production is relatively steady, the quantity of consumed natural gas will not be visibly fluctuating. The monitored FC_y was identified to be close to the estimated one, which has demonstrated that no measures, like efficiency increase, have been taken to reduce the FC_y and reached the decrease in project emission.</p> <p>The NCV is unlikely to be affected by the fuel switch and any other measures. In addition, no leakage calculation is required as per the applied methodology AMS-III.B version 14.</p> <p>Based on the discussion above, the conclusion is that the project activity meets the requirement of paragraph 22(a) of the selected methodology and the monitoring plan in the PDD ensures the emission reductions are claimed due to the fuel switch measure not on account of any other measures.</p>	
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