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CDM Executive Board

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Request for Review Response

Aquarius Hydroelectric Project, Reg. No. 0627

Dear Chair and Honourable Members of the CDM Executive Board,

Please find below the response of TÜV NORD JI/CDM Certification Program to the request for review of the above mentioned project activity.

If you have any questions do not hesitate to contact us.

Yours sincerely,



Dipl.-Ing. Rainer Winter

Head of TÜV NORD JI/CDM Certification Program

Request for Review Response

Request for Review raised by the CDM-Team	<p>The DOE is requested to clarify how it has verified the <u>operation</u> of the project activity is in accordance with the description provided in the registered PDD, considering the significant increase in electricity generation continuously during 3 years since the start of crediting period. The PP stated that this was due to an environment regulation that ensures a minimum water flow of 10m³/s to the project activity, however, this figure was not mentioned in the PDD. Further, the PDD specifies 70% plant capacity factor, while the actual capacity factors were calculated as 95%, 89% and 95%, for 2007, 2008, and 2009 respectively.</p> <p>As this may be considered as permanent changes, the DOE should have requested a notification or approval of changes to the project description as per para 197 of VVM version 01.2.</p>
DOE assessment and response	<p><u>DOE's assessment:</u></p> <p>During the site visit the verification team could verify that there were no changes in the implementation and operation of the project activity as compared with what is described in the registered PDD.</p> <p>Section 5 of the Verification Report states the compliance of the project activity and the monitoring procedures with the PDD.</p> <p>It is clearly stated in section 5.1 that the differences in the plant load factor as in the PDD and the actual plant load factor have already been addressed in the request for review for the monitoring period 2006-12-15 to 2007-12-31 (in the previous verification) by the PPs and the former DOE.</p> <p>The verification team has reviewed invoices, technical information and nameplates of the installed equipment (turbines and generators) and no discrepancies were detected from the previous verification period, PDD and the actual monitoring period.</p> <p>In addition, the compliance of the scenarios is stated in all sections of the Verification Report, as:</p> <ol style="list-style-type: none"> the electricity supplied to the grid by the project activity has been measured and cross-checked as per the registered PDD. the procedures, functions and responsibilities remain the same. no changes have happened in the operational and monitoring equipment. the installed capacity of the project activity continue the same as described in the PDD. <p><u>DOE's response:</u></p> <p>As per paragraphs 196 and 197 of the VVM, a notification or approval of changes is required only when physical features/implementation or operation of the plant have been changed from the PDD.</p> <p>As per the DOE's understanding no notification or approval of changes is needed for this specific case as no such changes have occurred and as the plant load factor variation is due to conditions outside the PP's influence, not characterizing</p>

	<p>an operational change.</p> <p>Further no notification or approval of changes was considered as nothing assures that the change in the plant load factor is permanent, as being an Environmental State Agency's regulation that can be changed again without any interference of the PPs. Therefore the DOE considered as sufficient to verify section 10. "Special Events and Overperformance" in the monitoring report, stating the differences in emission reductions between the registered PDD and actual monitoring report.</p>
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