




CDM: Form for submission of requests for deviation prior to submitting request for issuance

(To be used by the DOE for requesting a deviation prior to submitting request for issuance)

Name of the entity (DOE) submitting this form	CEC
Project Ref./Title of the project activity	2104: Baishuiquan Hydropower Project, Guizhou Province, China
Title/subject of deviation	Deviation from the registered Monitoring Plan regarding the electricity transported from a 110kV substation to a 35kV substation
Specify the monitoring period for which the request is valid	26 Mar 2010 - 25 Jul 2011
Date and signature for the DOE	2011.12.29 

Please use the space below to describe the deviation and substantiate the reason for requesting a deviation from provisions of registered monitoring plan.

The request for deviation is for the monitoring plan of the registered Project titled: Baishuiquan Hydropower Project, Guizhou Province, China, UNFCCC Ref.No:2104, registered on 08/05/2009.

According to the registered monitoring plan, Main Meter1 (accuracy 0.5s) and Main Meter2 (accuracy 0.5s) will be installed at 110kV Yinjiang Substation and 35kV Gonghe Substation respectively. The two meters are both bi-directional type which can measure the electricity exported to and imported from the grid, so the difference between the exported and imported data of Main Meter1 and Main Meter 2 is the net electricity supplied to the grid. The schematic diagram of the monitoring system in the registered monitoring plan is provided in Figure 1: The Monitoring System in the Registered Monitoring Plan and the equations to calculate the net electricity supplied to the grid are provided in Formulas (1)-(4): Please see Annex 1_Formula for calculate the net electricity supplied to the grid.

However, the electricity imported from 110kV Yinjiang Substation was much more than expected. The PP explained that the electricity in 35kV Gonghe Substation was not enough to provide the local users, so it caused to transport the electricity from 110kV Yinjiang Substation to 35kV Gonghe Substation, which caused the electricity imported from the 110kV Yinjiang Substation was more. Therefore a change in the condition or circumstances of the proposed CDM project activity occurred after it was registered as a proposed CDM project activity. The implementation of the Project was deviated from the original monitoring plan in Figure 2: The Deviation from the Registered Monitoring Plan, so the formula to calculate the net electricity measured by Main Meter 1 and Main Meter 2 is in Formulas (5)-(9): (Please see Annex 1)

The proposed project activity is originally planned to transport the electricity through 110kV Gonghe Substation to 35kV Substation during the first verification period (22/04/2009-25/03/2010), but this condition will continue to the first part of the second verification period, namely until on 31/12/2010, so according to the VVM, it needs to request for deviation in the second verification period (26/03/2010-25/07/2011). Based on the statement provided by the PP and on-site visit, the verification team verifies that the new 110kV substation is actually operating and supplying electricity in the Zunyi District on 01/01/2011, so the proposed project activity will stop this transportation from 110kV Gonghe Substation to 35kV Gonghe Substation since 31/12/2010.

During the monitoring period of 26/03/2010-25/07/2011, the electricity imported from 110kV Yinjiang Substation (G1) measured by Main Meter 1 included the electricity imported by the proposed project from 110kV Yinjiang Substation and the electricity transported from 110kV Yinjiang Substation to 35kV Gonghe Substation (EG1), which was included in the electricity imported records measured by Main Meter 1. And the electricity exported to 35kV Gonghe Substation (G2) measured by Main Meter 2 included the electricity exported by the proposed project to 35kV Gonghe Substation and the electricity transported from 110kV Yinjiang Substation to 35kV Gonghe Substation (E G2), which was included in the electricity exported records measured by Main Meter 2. Therefore, it was deviated from the registered monitoring plan, the formula is expressed in Annex 1:

The above formula shows that after deducting the electricity transported from 110kV Yinjiang substation to 35kV Gonghe substation, the net generated electricity is also the difference between the electricity exported to the power grid and the electricity imported from the power grid. Based on the above explanation, the emission reduction is calculated to be conservative because the loss is borne by the process.

And now Main Meter1 is also installed at the 110kV Yinjiang Substation and Main Meter2 is also installed at the 35kV Gonghe Substation, which measure the electricity exported to and imported from the grid, and included the electricity transporting from 110kV Yinjiang Substation to 35kV Gonghe Substation during this monitoring period.

In addition, the two check meters (M4 and M5) are installed at the high voltage side of main transformer substation in the plant, which are used to check the readings of Main Meter1 and Main Meter2, and the data can be calculated by deducting transmission loss. All above meters are calibrated according to the requirement of the registered monitoring plan. The detailed information of the main meters and the check meters are described in Annex 2_ Detailed Information of the Main Meters and the Check Meters.

Given the above actual condition, the electricity supplied to the grid by the proposed project shall be monitored directly according to the monitoring methodology ACM0002 ver.06. Although the electricity is transported from 110kV transmission line to 35kV transmission line, it will not impact the methods to calculate the net electricity supplied to the grid and the emission reduction is more conservative. Therefore we are submitting this request for deviation to the EB for approval before we can further proceed with the verification of the project. The deviation covers the monitoring period from 26/03/2010 to 25/07/2011.

Please use the space below to describe and substantiate the assessment of the DOE that the deviation does not require a revision of monitoring plan or the changes from the project activity as described in the registered project design document.

As the registered monitoring plan, the net electricity supplied to the grid will be monitored through Main Meter1 and Main Meter2 installed at 110kV Yinjiang Substation and 35kV Gonghe Substation. However as explained by the PP, the electricity imported from 110kV Yinjiang Substation is much higher than the estimate and the electricity exported to 35kV Gonghe Substation is increased, so that a change in the conditions of the proposed CDM project activity occurs after it is registered as a proposed CDM project activity. The same as has been verified by the verification team during the on-site visit.

And as the evidences provided by the PP, due to the power load increasing in June, 2009 in Zunyi District, Guizhou Province, the electricity supplied in 35kV Gonghe Substation is not enough to meet the demand, so a new 110kV Substation is actually operating on 01/01/2011 to meet the local electricity demand. Based on the above considerations, the grid company will dispatch the electricity from 110kV Yinjiang Substation to 35kV Substation through the current line in a temporary period from June 2009 to December 2010 in order to save the investment, in which the first monitoring period from 08/05/2009 to 25/03/2010 and the 2nd monitoring period from 26/03/2010-25/07/2011 are both included.

The verification team has verified that the new 110kV substation is actually operating and supplying the electricity to Zunyi District, Guizhou Province on 01/01/2011. Hence, the end date of deviation period is in 31/12/2010. Please see Annex 5_ Statement of Electricity Transported.

After the new 110kV Substation is actually operating in December 2010, the electricity will be supplied to Zunyi District, Guizhou Province by the new 110kV Substation through 110kV Baisun transmission line, which is a new transmission line. So the electricity is still supplied by the proposed project to the grid through 110kV Yinjiang Substation and 35kV Substation instead of the new 110kV Substation and the net electricity supplied by the proposed project to the grid is still monitored by Main Meter 1 and Main Meter 2 respectively. Therefore the monitoring is in consistence with the registered monitoring plan and the approved methodology ACM0002.ver.06. So the verification team confirms that no direct export of electricity to the grid has occurred through the new 110kV Substation during the monitoring period if the request for deviation is valid. (See the attached Annex 2: Status explanation issued by the Grid Company). So the verification team concludes that the current condition will not occur in the future. Please see Annex 3_ The Monitoring System in the Future.

But during the monitoring period of 26/03/2010-25/07/2011, a change in the procedures for monitoring emission reductions has occurred, but the methods to calculate the net electricity supplied to the grid are not changed and the emission reduction is more conservative after the transmission loss is borne by the proposed project from 110kV Yinjiang Substation to 35kV Gonghe Substation. Thus the deviation does not require an amendment to the approved methodology ACM0002 ver.06. Furthermore, this non-compliance is not a permanent deviation from the registered monitoring plan, therefore a deviation other than revision of monitoring plan is proposed.

Please use the space below to describe the impact of the deviation on the estimates of the emissions reductions for the proposed project activity with the use of approved methodology as existing and with the deviation. Please substantiate the estimations with relevant and verifiable data.

With the deviation, the estimate of emission reduction is more conservative. And evidences such as daily reading records, ER calculation spreadsheets, meter calibration certificates are submitted. All documents evidences and meters have been checked. The verification team of CEC confirms that there is no impact of the deviation on the estimates of the emission reductions for the proposed project activity with the use of the approved methodology as existing and with the deviation. Moreover, the emission reduction is more conservative because of the loss which is deducted by the PP.

Link to the monitoring report

<https://cdm.unfccc.int/Projects/DB/TUEV-SUED1218543959.52/iProcess/CEC1320112149.76/view>

If necessary, list attached public files containing relevant information which is not available through the above link

Annex 1_Formula for calculate the net electricity supplied to the grid (confidential)

Annex 2_Detailed Information of the Main Meters and the Check Metersdoc (confidential)

Annex 3_The Monitoring System in the Future (confidential)

Annex 4_Deviation_Complete_Clean_02 (confidential)

Annex 5_Statement of electricity transported (confidential)