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Att: CDM Executive Board

Your ref.:  
CDM Ref 0298

Our ref.:  
GASR/KAVR /BRADB/MLEH

Date:  
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**Response to requests for review of project activity 0298  
“4.5 MW Biomass (low density Crop Residues) based Power Generation unit of Malavalli  
Power Plant Pvt Ltd.” at Kirugavalu Village, Malavalli Taluka, Karnataka, India**

Dear Members of the CDM Executive Board,

We refer to the issues raised in the requests for review concerning DNV's request for issuance for project activity 0298 “4.5 MW Biomass (low density Crop Residues) based Power Generation unit of Malavalli Power Plant Pvt Ltd.” at Kirugavalu Village, Malavalli Taluka, Karnataka, India. DNV would like to provide the following response to the issue raised.

***Question 1: It is noted that the PP measured the NCV yearly for this monitoring period, but the monitoring plan requires monitoring on monthly basis. Further clarification is required on why DOE did not request a deviation to address this issue prior to the request for issuance.***

**DNV's response:**

DNV acknowledges the Executive Board's observation that the monitoring plan of the registered PDD requires monitoring of the net calorific value (NCV) of each kind of biomass residue on a monthly basis from an independent third party. As stated in our verification report, the project proponent had monitored the NCV of each kind of biomass residues on an annual basis, and hence deviated from the monitoring plan of registered PDD.

DNV accepted the deviation of the annual monitoring as opposed to the monthly monitoring without seeking a deviation, considering the CDM EB's General Guidance for SSC methodologies version 12<sup>1</sup>, (EB 41 Annexure- 20 Para 12 b), which states that *"Data elements that are generally constant and indirectly related to the emission reductions (E.g. Emission factors, Calorific Value, System Efficiencies) should be measured or calculated at least once in a year, unless detailed specifications are provided as part of the indicated methodology"*. The applied methodology and its version (AMS-I.D, version 7) do not require the monitoring of net calorific value (NCV) of each kind of biomass residues used. DNV would also like to state that, for the project activity, monitoring of NCV of each kind of biomass residues does not have any impact (direct or indirect) on the emission reductions as it is not forming the basis of emission reductions calculation. Hence,

<sup>1</sup> [http://cdm.unfccc.int/EB/041/eb41\\_repan20.pdf](http://cdm.unfccc.int/EB/041/eb41_repan20.pdf)

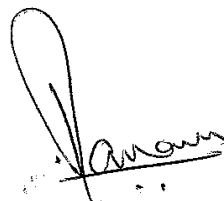
DNV accepted the monitoring of NCV from independent third party for each kind of biomass residues on annual basis.

We sincerely hope that the Board accepts our aforementioned explanations.

Yours faithfully  
for DET NORSKE VERITAS CERTIFICATION AS



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