

FINDINGS OVERVIEW

[CHAMBAL POWER LIMITED (CPL) Proposed 7.5 MW Biomass Based Power Project At Rangpur, Kota District, Rajasthan, India.]

Each Table below represents a finding from the validation assessment. The findings are numbered consecutively, approximately in the order that they have been identified.

Description of table:

Type	Findings are either New Information Requests (NIR) or Corrective Action Requests (CAR). CARs are items that must be addressed before a project can receive a recommendation for registration. NIRs may lead to the raising of CARs. Observations are included at the end and may or may not be addressed. They are primarily to act as signposts for the verifying DOE.
Issue	Details the content of the finding
Ref	refers to the item number in the Validation Protocol
Response	Please insert response to finding, starting with the date of entry.

Rows for comments and further response will be appended to the table until the Findings has been addressed to the satisfaction of the Lead Assessor.

Please note that this is an open list and more findings may be added as validation progresses.

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
1	NIR 1	No Annex I Country has been identified for this project. Is there an Annex I Country for this project?	1.1
Date: 07/02/06 [Comments]: Not required as EB has agreed that the registration of a CDM project activity can take place without an Annex 1 Party being involved at the stage of registration {refer to "Glossary of CDM terms" in the "Guidelines for completing the CDM-PDD, CDM-NMB and CDM-NMM", definition of "Approval by Parties involved". Therefore, this is no longer a non-compliance Please note that if an Annex Party is identified, a Letter of Approval should also be provided.			
Date: 08/02/2006 [Acceptance and close out] OK, NIR 1 Closed Martin Beckmann			

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
2	CAR 1	No Letter of Approval provided from the host country confirming voluntary participation and contribution to sustainable development	1.2
Date: 07/02/06 [Comments]: HCA letter for the project provided to local assessor. Refer enclosed Annex 2 (Letter of approval)			
Date: 08/02/2006 [Acceptance and close out] OK, CAR1, Closed Martin Beckmann			

Date: 10-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
3	CAR 2	<p>Section A.3. With the new guidance the DNA doesn't have to be included as a project participant anymore (unless they get a share of the CERs)</p> <p>Of the 2 entries the top one can be deleted and the bottom row can be left. For the third column, please note that the header talks about Party. In the context of the KP a Party (with a capital P) is always a "Party to the Kyoto Protocol" and therefore a country that signed the KP. Column 3 therefore refers back to the Parties in column No. 1. In this case India will actually not be a project participant (actively participating and getting a share of the CERs and therefore the column should read 'no' instead of 'yes'.</p>	1.6
<p>Date: 02/03/06</p> <p>[Comments] Corrections made to the PDD provided to the local assessor</p>			
<p>Date: 06/03/2006</p> <p>[Acceptance and close out] OK, CAR 2 Closed Martin Beckmann</p>			

Raised by: Martin Beckmann

No.	Type	Issue	Ref
4	NIR 2	Further information that public funding has not been made is required.	1.7
<p>Date: 07/02/06</p> <p>[Comments]: Information has been provided to local assessor. Enclosed in L Annex 3 (balance sheet) is documentary evidence that public funding was not available for the project</p>			
<p>Date: 08/02/2006</p> <p>[Acceptance and close out] OK, NIR 2 Closed Martin Beckmann</p>			

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
6	NIR 3	<p>Quantity of biomass available</p> <p>Are the amounts reasonable?</p> <p>Biomass in quantities described and in that short distance from power station seems to be very high. Evidence of biomass availability in table 1.2 has to be shown by biomass assessment report conducted by RREC.</p> <p>Are contract signed? What guarantees for delivery are there?</p>	1.10
<p>Date: 07/02/06</p> <p>[Comments]: Biomass study report provided to local assessor. Enclosed in L Annex 4 (Purchase agreement and abstract of feasibility report)</p>			
<p>Date: 08/02/2006</p> <p>[Acceptance and close out] OK, NIR 3 Closed Martin Beckmann</p>			

Date: 10-10-2005

Project No.: CDMVal0096 (Chambal Power Limited)

Date: 05-10-2005

Raised by: Syed Khursheed Zaidi

No.	Type	Issue	Ref
5	CAR 3	<p>URL links</p> <p>Few of the 8 web links mentioned in the PDD have been upgraded as most of the referred data taken is from 2003 with out the web links.</p> <p>The developer should provide URL link of that particular page to check the authenticity of the data as given in the PDD. Statements, data etc should be fully referenced so that everything can be traced back to the 'raw' data. If websites are used the URLs should be complete.</p>	1.10

Date: 07/02/06

[Comments]: Data sources and relevant baseline information provided to local assessor. Enclosed in L Annex 2

Date: 08/02/2006

[Acceptance and close out] OK, CAR 3 Closed Syed Khursheed Zaidi

Date: 12-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
7	NIR 4	<p>Leakage for biomass:</p> <p>What would happen with significant amounts of biomass under baseline scenario? If the biomass is used as fuel or fertilizer under baseline this could lead to leakage. Please clarify zero emission concepts.</p>	1.10 / 4.4.

Date: 07/02/06

[Comments]: Information provided to local assessor. Biomass was being burnt and wasted before project activity

Date: 08/02/2006

[Acceptance and close out] OK NIR 4 Closed Martin Beckmann

Date: 12-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
8	NIR 5	<p>Long time biomass storage</p> <p>Within project operation long term storage of biomass could lead to significant methane emissions. How and for how long will the biomass been stored?</p>	1.10

Date: 07/02/06

[Comments] Information already provided to local assessor. Biomass to be stored for 3 months.

Date: 08/02/2006

[Acceptance and close out] , OK, NIR 5 Closed Martin Beckmann

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
9	NIR 6	<p>Leakage for biomass transportation</p> <p>Is it reasonable that 70% of biomass will be collected within only 5 km distance, no transports more than 15 km (max.) from project site?</p> <p>This argument that there is availability in short distance is vital. Only when biomass is available as described the "...leakage due to coal transportation may be on higher side than for biomass."</p> <p>Evidence has to be shown for distances of suppliers in table 1.2 on p 6</p>	1.10 / 4.4
Date: 07/02/06 [Comments]: Information provided to local assessor as per L Annex 4 (all parts).			
Date: 08/02/2006 [Acceptance and close out] OK, NIR 6 Closed Martin Beckmann			

Date: 06-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
10	NIR 7	<p>Rated capacity of the boiler:</p> <p>The PDD is not very clear on the use of coal. On PDD, p. 4, co-firing coal is mentioned as a definitive possibility, on p.46 it is biomass only. This can be important for the eligibility of the project. Eligibility and the 15 MW thresholds are based on installed, rated capacity of the boiler/-installation. The rating can vary depending on fuels used. By co-firing coal the output of the boiler might increase depending how it is designed.</p> <p>Please give the specifications of the manufacturer for the boiler so that the rated capacity of the boiler can be checked. Is the rating based on biomass or co-firing?</p>	2.1.
Date: 02/03/06 [Comments]: Information provided to local assessor that coal will not be used in the project. It has been addressed in the PDD.			
Date: 06/03/2006 [Acceptance and close out] OK, NIR 7 Closed Martin Beckmann			

Date: 13-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
11	NIR 8	<p>The calculation in a transparent and conservative manner according to § 7 of Appendix B of the simplified modalities and procedures for small-scale CDM with foot note Nr. 9 is O.K.</p> <p>Where are the power generation data for BM calculation (power station MU, shares to Rajasthan for ex. SJVNL and Chamera etc.) from?</p>	2.3.

Date: 02/03/06

[Comments]: Information provided to local assessor. In the revised PDD, northern regional grid emission factor has been used for calculating baseline emissions and all support documents are as provided in L Annex 2.

Date: 06/03/2006

[Acceptance and close out] OK, NIR 8 Closed Martin Beckmann

Date: 12-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
12	NIR 9	<p>EXCEL-Spreadsheets "CER_Calculations_CPL_Val_17Aug 05"</p> <p>The supporting spreadsheets are not very transparent and retraceable.</p> <p>Please add column in supportive sheet 1 EXCEL Sheet "CER_Calculations_CPL_Val_17Aug 05" with the fuel (coal, gas etc.) used. Add this table in PDD E 1.2.4 as well.</p> <p>How has the power export to RRVPNL (kWh) = 53220000 kWh been calculated?</p>	2.3. / 2.5

Date: 02/03/06

[Comments]: In the revised PDD, northern regional grid emission factor has been used for calculating baseline emissions and all support documents are as provided in L Annex 2.

Date: 06/03/2006

[Acceptance and close out] OK, NIR 9 Closed Martin Beckmann

Date: 12-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
13	NIR 10	<p>Determination of leakage for project activity in accordance with baseline methodology:</p> <p>Appendix B of the simplified modalities and procedures for small-scale CDM § 8 indicates, that if the energy generating equipment is transferred from another activity or if the existing equipment is transferred to another activity, leakage is to be considered.</p> <p>Give evidence that this has been taken into account.</p> <p>Further more to leakage: see 1.10</p>	2.5.

Date: 07/02/06

[Comments]: Information provided to local assessor. This aspect is not relevant to CPL's project activity as there is no transfer of equipment involved

Date: 08/02/2006

[Acceptance and close out] OK, NIR 10 Closed Martin Beckmann

Date: 12-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
14	CAR 4	<p>Additionality Analysis:</p> <p>Although the baseline is fixed by the methodology we think that an additionality analysis has to be carried out with</p> <ul style="list-style-type: none"> - identification of alternatives - clear discussion why barriers exist that would prevent the implementation of the type of pro-posed project activity from being carried out but do not prevent the implementation of at least one of the alter-natives. <p>Some of the identified barriers seem to apply to doing business in general and it is not clear for the barriers exist for this type of project activity and not for other alternatives.</p> <p>Please give documented evidence.</p>	3.1.

Date: 02/03/06

[Comments]: Information provided to local assessor and modifications to PDD made though the above is not relevant to small scale CDM projects. Refer L Annex - 5 & 6

Date: 06/03/2006

[Acceptance and close out] OK, CAR 4 Closed Martin Beckmann

Date: 06-10-2005

Raised by: Syed Khursheed Zaidi

No.	Type	Issue	Ref
15	NIR 11	<p>Fossil fuel quantity evaluation:</p> <p>The methodology is applicable to the project & the monitoring consists of metering the electricity generated and supplied to the grid. Quantity of Biomass to be used are clear, but if the plant does not run on 100 % biomass, the provision of Fossil fuel quantity evaluation should be accounted (see PDD p37).</p>	4.1

Date: 02/03/06

[Comments]: Information provided to local assessor that coal will not be used in the project. It has been addressed in the PDD. Any fossil fuel use will be accounted for as per Section D.3 of PDD

Date: 06/03/2006

[Acceptance and close out] OK, NIR 11 Closed Syed Khursheed Zaidi

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
16	NIR 12	<p>There are no quality control (QC) and quality assurance (QA) procedures. It is not sufficient to briefly mention that monitoring parameters are to be measured according to "ISO 9001 or similar system")</p>	4.5

Date: 07/02/06

[Comments]: Information provided to the local assessor. Monitoring procedures enclosed in

L Annex 7

Date: 08/02/2006

[Acceptance and close out] OK, NIR 12 Closed Martin Beckmann

Date: 12-10-2005

Raised by: Marco van der Linden

No.	Type	Issue	Ref
17	NIR 13	<p>Since construction already started and operation starts in October 2005 there should be more information in the monitoring plan.</p> <p>Please present details on meters used, accuracy of the meters used, procedures, responsibilities etc.</p> <p>The current MP uses the term should quite a lot instead of "we will" do this... This is not enough.</p>	5.1.1

Date: 02/03/06

[Comments]: Information provided to the local assessor that the meters for recording export of power to grid are supplied by Larsen & Toubro with accuracy range of (+/-) 0.2 % The plant will be on trial runs in Feb 2006. Monitoring procedures enclosed in L Annex 7

Date: 06/03/2006

[Acceptance and close out] OK, NIR 13 Closed Martin Beckmann

Date: 06-10-2005

Raised by: Syed Khursheed Zaidi

No.	Type	Issue	Ref
18	NIR 14	<p>Although a long list of benefits has been given, there is no information on how these will be monitored. How can all other stakeholders be sure that these things will happen?</p> <p>Please ensure that indicators for sustainable environment will be monitored.</p>	5.1.2

Date: 07/02/06

[Comments]: Information provided to local assessor that this project does not require monitoring of sustainable indicators (environmental, social and health related) as it's a small scale project and further environmental clearance has been obtained for project. L Annex 9

Date: 08/02/2006

[Acceptance and close out] OK, NIR 14 Closed Syed Khursheed Zaidi

Date: 06-10-2005

Raised by: Syed Khursheed Zaidi

No.	Type	Issue	Ref
19	NIR 15	Please give confirmation from another source besides the PDD sustainable development indicators in line with stated national priorities in the Host Country.	5.1.4

Date: 07/02/06

[Comments] Information already provided to local assessor that this project does not require

monitoring of sustainable indicators (environmental, social and health related) as it's a small scale project.

HCA letter mentions that the project contributes to sustainable development in India, the host country.

Further environmental clearance and consents to operate plant under the Air and Water acts as per State Pollution Control Board (SPCB) has been obtained for project which clearly implies that the project is in line with the national priorities of the host country.

Date: 08/02/2006

[Acceptance and close out] OK NIR 15 Closed Syed Khursheed Zaidi

Date: 06-10-2005

Raised by: Syed Khursheed Zaidi

No.	Type	Issue	Ref
20	CAR 5	The project management structure and responsibility and authority of project management have not been defined. Please define clearly.	5.2.1 / 5.2.2

Date: 02/03/06

[Comments]: Information provided to the local assessor that this has been addressed in the PDD in section D.5

Date: 06/03/2006

[Acceptance and close out] These are also supported by L Annex 7. OK, CAR Closed Syed Khursheed Zaidi

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
21	CAR 6	Authority and responsibility for registration, monitoring, measurement and reporting has not been clearly defined. Please define it clearly.	5.2.2

Date: 07/02/06

[Comments]: Information already provided to the local assessor that this has been addressed in the PDD in section D.5.

Further refer to L Annex 7 for monitoring procedures.

Date: 08/02/2006

[Acceptance and close out] OK, CAR 6 Closed Martin Beckmann

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
22	NIR 16	There are no procedures for training and monitoring personnel. These procedures are vital to ensure that operation and monitoring is carried out correctly. Please show that these procedures are there and are followed.	5.2.3

Date: 07/02/06

[Comments]: Information provided to the local assessor that this has been addressed in the

L Annex 7

Date: 08/02/2006

[Acceptance and close out] OK, NIR 16 Closed Martin Beckmann

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
23	NIR 17	There are no procedures for emergency preparedness. Please show that these procedures are there they are followed.	5.2.4

Date: 07/02/06

[Comments]: Information already provided to local assessor, refer L Annex 7

Date: 08/02/2006

[Acceptance and close out] OK, NIR 17 Closed Martin Beckmann

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
24	NIR 18	There are no procedures identified for calibration of monitoring equipment and procedures for maintenance of monitoring equipment and installations These procedures are vital for quality QA and QC. Please show that these procedures are there and are followed.	5.2.5 / 5.2.6

Date: 07/02/06

[Comments]: Information already provided to the local assessor that this has been addressed in the L Annex 7

Date: 08/02/2006

[Acceptance and close out] OK, NIR 18 Closed Martin Beckmann

Date: 10-10-2005

Raised by: Martin Beckmann

No.	Type	Issue	Ref
25	NIR 19	<p>There are no procedures identified for</p> <ul style="list-style-type: none"> - dealing with possible monitoring data adjustments and uncertainties - procedures for review of reported results/data. - procedures for internal audits of GHG project compliance with operational requirements - procedures for project performance reviews before data is submitted for verification, internally or externally - procedures identified for CAR's in order to provide for more accurate future monitoring and reporting <p>These procedures are vital for quality QA and QC. Please show that these procedures are there and that they are followed.</p>	5.2.9 to 5.2.13

Date: 07/02/06

[Comments]: Information provided to the local assessor that this has been addressed in the L Annex 7

Date: 08/02/2006
[Acceptance and close out] OK, NIR 19 Closed Martin Beckmann

Date: 10-10-2005 Raised by: Syed Khursheed Zaidi

No.	Type	Issue	Ref
26	NIR 20	Requirements for EIA: The project needs to get an EIA done by a competent agency and evaluated by a competent authority (State Pollution Control). Please show evidence for approval.	6.1 & 6.2

Date: 07/02/06
[Comments]: Information provided to local assessor.
Consent to establish the power plant has been obtained from Rajasthan State Pollution Control Board (RSPCB) as enclosed in L Annex 9 after providing the Rapid EIA report to the authority

Date: 08/02/2006
[Acceptance and close out] OK, NIR 20 Closed Syed Khursheed Zaidi

Date: 10-10-2005 Raised by: Martin Beckmann

No.	Type	Issue	Ref
27	NIR 21	Identification of environmental impacts: No identification of environmental impacts in the EIA has been carried out. This is vital for EIA. In EIA the developer needs to identify the impacts and has to give an EMP. Please confirm that all relevant environmental impacts have been identified. The project developer needs to identify the impacts and has to give an EMP, compliance of which is mandatory.	6.5

Date: 07/02/06
[Comments]: Information provided to local assessor. Rapid EIA was conducted for the project and EMP has been proposed which is being followed by CPL during project construction. Details of EMP enclosed in L Annex 10.

Date: 08/02/2006
[Acceptance and close out] OK, NIR 21 Closed Martin Beckmann

Date: 10-10-2005 Raised by: Martin Beckmann

No.	Type	Issue	Ref
28	NIR 22	Local stakeholder consultation has not been finished so far. Is it finished in the meantime? How have the stakeholders for the project been identified. It seems that immediate neighbours to the plant and the collecting facilities for the agro waste have not been identified. Please make sure that all relevant stakeholders have been addressed to. As LSC is not finished, please show what comments have been received	7.1 to 7.5

		from them.	
Date: 07/02/06 [Comments]: Information provided to local assessor. Stakeholder consultation reports are in L Annex 11 (Stake Holder Consultations)			
Date: 08/02/2006 [Acceptance and close out] OK, NIR 22 Closed Martin Beckmann			

Date: 10-10-2005 Raised by: Martin Beckmann

No.	Type	Issue	Ref
29	NIR 23	Please ensure that project design engineering reflect current good practices	8.2.1
Date: 02/03/06 [Comments]: Information provided to local assessor that CPL has selected M/s. Mitcon consultancy services limited, a reputed consultancy firm in the field of biomass based power plant. Mitcon is joint venture company of financial institutions / banks / government of Maharashtra, having more than 20 years of experience, which reflects good engineering practices			
Date: 06/03/2006 [Acceptance and close out] OK, NIR 23 Closed Martin Beckmann			

Date: 10-10-2005 Raised by: Martin Beckmann

No.	Type	Issue	Ref
30	NIR 24	Starting date of the project was march 2004 (construction start date) in October 2005 it starts commercial production; starting date of the crediting period is in march 2006. Project is requested to: (a) Provide evidence of the starting date of the CDM project activity; and (b) Provide evidence that the incentive from the CDM was seriously considered in the decision to proceed with the project activity (CPL's board decision on project - date minutes, documentation -) This evidence shall be based on (preferably official, legal and/or other corporate) documentation that was available to third parties at, or prior to, the start of the project activity.	8.3.1.
Date: 07/02/06 [Comments]: Information provided to local assessor. Documentary evidence that incentive from CDM was seriously considered is enclosed in L Annex 6 (Board meeting).			
Date: 08/02/2006 [Acceptance and close out] OK, NIR 24 Closed Martin Beckmann			

Date: 10-10-2005 Raised by: Martin Beckmann

No.	Type	Issue	Ref
31	NIR 25	Presentation of good monitoring practice in monitoring plan. Please	9.12.

		ensure that good monitoring practice takes place in monitoring plan.	
Date: 07/02/06 [Comments] Information provided to the local assessor. Refer L Annex 7			
Date: 08/02/2006 [Acceptance and close out] OK, NIR 25 Closed Martin Beckmann			

Date: 10-10-2005 Raised by: Martin Beckmann

No.	Type	Issue	Ref
32	CAR 7	The PDD has been prepared in accordance with appendix A of Annex II to Decision 21/CP.8 in principle. Few changes such as excess number of pages than specified, font size, italics, shaded tables etc. have been made, for example. D 6. A chart above the headline In table 1.3 dimensions are missing, please add them.	A.4 8.1.1, PDD
Date: 02/03/06 [Comments] The table 1.3 in the previous version of PDD referred to Rajasthan Power Scenario. The table was deleted as Rajasthan grid details are not any more used as baseline and Northern regional grid was used in its place. Information discussed with local assessor and changes incorporated in PDD as necessary			
Date: 06/03/2006 [Acceptance and close out] Ok, CAR 7 Closed Martin Beckmann			

Date: 10-10-2005 Raised by: Martin Beckmann

No.	Type	Issue	Ref
34	CAR 8	Crediting periods in Enclosure A of CER_Calculations_CPL_Val_17Aug 05 is not consistent with PDD. Whilst the enclosure starts with credit period 2005 – 2006 the PDD starts with credit period 2006 – 2007. Please check and state in enclosure consistently to PDD.	9.8
Date: 02/03/2006 [Comments]: Incorporated in PDD has been incorporated and the excel sheet has been corrected, ER calculation sheet with Trace precedence provided to the validator.			
Date: 06/03/2006 [Acceptance and close out] Ok, CAR 8 Closed Martin Beckmann			

Observations: --