



VALIDATION OPINION POST REGISTRATION CHANGES


Final


**“Paraíso Small Hydropower Plant - PCH Paraíso”
in
Brazil**

Validation Opinion N°2015-BQ-36-MD

Revision N°2.0 Aa

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Project Title: Paraíso Small Hydropower Plant - PCH Paraíso		Country: Brazil	CDM Registration Reference N°: 1317	
Client: Energias do Brasil S/A		Client contact: Carla Regina Ferreira		
Report No.: 2015-BQ-36-MD		Revision: 2.0 Aa	Date of this report: 19/01/2016	
Approved by (Final Report – Authorized officer signing for the DOE):  Laura Severino			Date of approval: 22/01/2016	
Methodology				
Number: ACM0002	Version: 6 of 19/05/2006	Title: Consolidated baseline methodology for grid-connected electricity generation from renewable sources	Scale Large	SS(s): 1
<p>RINA Services S.p.A. (RINA), commissioned by Energias do Brasil S/A, has performed the validation of post registration changes for the project activity “Paraíso Small Hydropower Plant - PCH Paraíso” in Brazil.</p> <p>It is RINA’s opinion, the changes, as outlined in the revised PDD version 07 of 18/01/2016, from the project activity as described in the registered PDD ensure that the level of accuracy and completeness in the monitoring and verification process is not reduces as a result of the revision; the revisions are in accordance with the applied monitoring methodology and the changes to the project activity comply with the requirements established in the CDM Project Standard.</p> <p>Hence RINA requests that the validation opinion on changes from the project activity as described in the registered PDD for the project activity “Paraíso Small Hydropower Plant - PCH Paraíso” in Brazil may be considered by the Board.</p>				

Work carried out by: Thaís de Lima Carvalho Geisa Principe	<input checked="" type="checkbox"/> No distribution without permission from the Client or organizational unit responsible <input type="checkbox"/> Strictly confidential <input type="checkbox"/> Unrestricted distribution
Work verified by (Final Report)  Rita Valoroso	Keywords: Climate Change, Kyoto Protocol, Clean Development Mechanism

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Abbreviations

BE	Baseline Emissions
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CDM M&P	Modalities and Procedures CDM
CER(s)	Certified Emission Reduction(s)
CH ₄	Methane
CL	Clarification Request
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
CRT	Coordination and Technical Control Staff
DCI	Certification Division of RINA Services Spa
DNA	Designated National Authority
DOE	Designated Operational Entity
EB	Executive Board
EIA	Environmental Impact assessment
ER	Emission Reductions
FAR	Forward Action Request
GHG(s)	Greenhouse gas(es)
GWP	Global Warming Potential
IPCC	Intergovernmental Panel on Climate Change
LoA	Letter of Approval
MoV	Means of Verification
MP	Monitoring Plan
MR	Monitoring Report
NGO	Non-governmental Organization
ODA	Official Development Assistance
PCP	Project Cycle Procedure
PDD	Project Design Document
PE	Project Emission
PP(s)	Project Participant(s)
PS	Project Standard
Ref.	Document Reference
RINA	RINA Services Spa
SS(s)	Sectoral Scope(s)
TA(s)	Technical Area(s)
UNFCCC	United Nations Framework Convention on Climate Change
VVS	Validation and Verification Standard

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1 INTRODUCTION

Energias do Brasil S/A has commissioned RINA to carry out the validation of the revised monitoring plan for the “Paraíso Small Hydropower Plant - PCH Paraíso” project in Brazil.

This report summarizes the findings from the validation of the monitoring plan of the project, performed on the basis of UNFCCC criteria for CDM, as well as criteria given to provide for consistent project operations, monitoring and reporting.

1.1 Objective

The objective of the Validation is to have an independent evaluation of the changes of the project activity from the registered PDD compliance with relevant UNFCCC requirements Project Standard to confirm that it is sound and reasonable and meets the identified criteria and to ensure the level of accuracy and completeness. The objective of this validation was to assess the revised project design document in order to confirm its accuracy and completeness of the information reported for the “Paraíso Small Hydropower Plant - PCH Paraíso” project in Brazil.

1.2 Scope

The validation scope is to review the revised project design document (PDD) against the UNFCCC criteria for CDM and it is defined as required in the context of proposed revision of a registered CDM activity and will result in a conclusion by the executing RINA as to whether a revised PDD is valid and should be submitted to replace the previous version.

UNFCCC criteria refers to paragraph 62(g) of the modalities and procedures for the CDM

The Validation Opinion is not meant to provide any consultancy towards the project participants. However, stated requests for clarifications and/or corrective actions may have provided input for improvement of the project design.

2 METHODOLOGY

Validation was conducted using RINA procedures in line with the requirements specified in the CDM M&P, the latest version of the CDM Validation and Verification Manual, and relevant decisions of the COP/MOP and the CDM EB and applying standard auditing techniques.

The following sections outline each step in more detail.

2.1 Document Review

The PDD, version 07 of 18/01/2016 and previous versions /01/, and the supporting documents listed below are used for validation assessment.

The following table lists the documentation that was reviewed during the verification.

/01/	<p>Energias do Brasil: CDM-PDD for project activity “Paraíso Small Hydropower Plant - PCH Paraíso” in Brazil, version 4 of 25/05/2007 (registered PDD)</p> <p>Energias do Brasil: CDM-PDD for project activity “Paraíso Small Hydropower Plant - PCH Paraíso” in Brazil, version 05 of 21/05/2015</p> <p>Energias do Brasil: CDM-PDD for project activity “Paraíso Small Hydropower Plant - PCH Paraíso” in Brazil, version 06 of 08/10/2015</p>
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	Energias do Brasil: CDM-PDD for project activity "Paraíso Small Hydropower Plant - PCH Paraíso" in Brazil, version 07 of 18/01/2016
/02/	CDM Executive Board: Clean Development Mechanism Project Cycle Procedure, version 7 of 01/06/2014
/03/	CDM Executive Board: Clean Development Mechanism Project Standard, version 7 of 01/06/2014
/04/	CDM Executive Board: Clean Development Mechanism Validation and Verification Standard, version 7 of 01/06/2014
/05/	Brazilian DNA web site, data available in Portuguese and English for the emission factor http://www.mct.gov.br/index.php/content/view/303069.html accessed on 08/10/2015
/06/	CDM Executive Board: Baseline and monitoring methodology ACM0002, "Consolidated baseline methodology for grid-connected electricity generation from renewable sources", version 6 of 19/05/2006
/07/	DET NORSKE VERITAS verification report for the project activity "Paraíso Small Hydropower Plant - PCH Paraíso" in Brazil, number 2012-0586, version 01 of 28/06/2012
/08/	Brazilian DNA (MCTi – Ministério da Ciência, Tecnologia e Inovação): resolution nº8 of 26th May 2008, defines the Brazilian grid as a unique system and the responsibility of DNA to publish emission factor data, available in Portuguese at < http://www.mct.gov.br/upd_blob/0024/24719.pdf > accessed on 19/01/2016
/09/	Brazilian DNA (MCTi – Ministério da Ciência, Tecnologia e Inovação) clarification note about the Brazilian grid available in Portuguese at < http://www.mct.gov.br/upd_blob/0024/24562.pdf > accessed on 19/01/2016
/10/	Brazilian DNA (MCTi – Ministério da Ciência, Tecnologia e Inovação) CO2 emission factors by Brazil's National Interconnected System, available in English at < http://www.mct.gov.br/index.php/content/view/73318.html > accessed on 19/01/2016

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2.2 Follow-up actions

On 06/10/2015 and 08/10/2015, RINA, visited SHP Paraíso located in Costa Rica-MS and the office located in São Paulo-SP, Brazil. During the on-site assessment of the project RINA assessed the implementation and operation of the proposed project activity, reviewed the information flows for generating, aggregating and reporting the monitoring parameters, interviewed key personnel of the plant to confirm the operational and data collection procedures, cross-checked between information provided in the monitoring report and data plant, checked the monitoring equipment including calibration performance, reviewed calculations and assumptions made in determining the GHG data and emission reductions, checked the quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters.

The key personnel interviewed and the main topics of the interviews are summarized in the table below.

	Date	Name and Role	Organization	Topic
/a/	06/10/2015 and 08/10/2015	David Garcia-Consultant	Get2C Brasil Consultoria de Gestão, Ltda	Emission Reductions calculation Monitoring report Monitoring plan Emission factor
/b/	06/10/2015	Thiago Guimarães Bais Martins-Environmental analyst	EDP - ENERGIAS DO BRASIL S.A	Monitoring plan Monitoring methodology Monitoring data Implementation status of the project
/c/	06/10/2015	Alexandre Oliveira Lossavero-Maintenance	EDP - ENERGIAS DO BRASIL S.A	Monitoring equipment and operation Calibration of equipment's
/d/	06/10/2015 and 08/10/2015	Carla Regina Ferreira da Silva-Sustainability analyst	EDP - ENERGIAS DO BRASIL S.A	Emission Reductions calculation
/e/	08/10/2015	Anaí Fogaça de Almeida-O&M Planning Engineer	EDP - ENERGIAS DO BRASIL S.A	

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2.3 Resolution of outstanding issues

The objective of this phase of the validation was to resolve any outstanding issues which needed to be clarified prior to RINA's positive validation opinion on the changes of the project activity as described in the registered PDD. To guarantee transparency a verification protocol has been customized for the project. The protocol shows in a transparent manner the requirements, means of verification and the results from verifying the identified criteria. The verification protocol consists of three tables; the different columns in these tables are described in the figure below (see Figure 1). The completed validation protocol is enclosed in Appendix A to this report

A corrective action request (CAR) is raised if one of the following occurs:

- The project participants have made mistakes that will influence the ability of the project activity to achieve real, measurable additional emission reductions.
- The CDM requirements have not been met.
- There is a risk that the emission reductions cannot be monitored or calculate.

A clarification request (CL) is raised if information is insufficient or not clear enough to determine whether the applicable CDM requirements have been met.

A forward action request (FAR) is raised during verification for actions if the monitoring and reporting require attention and/or adjustment for the next monitoring period. CARs, CLs and FARs identified are included in the verification protocol in Appendix A of this report.

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Figure 1 Verification protocol tables

Verification Protocol, Table 1 - Requirement checklist				
Checklist Question	Ref.	MoV	Comments	Conclusion
The checklist is organized in two different sections.	Makes reference to documents where the answer to the checklist question or item is found.	Explain how conformance with the checklist question is investigated. Examples are document review (DR), interview or any other follow-up actions (I), cross checking (CC) with available information relating to projects, (N/A) means not applicable.	The discussion on how the conclusion is arrived at and the conclusion on the compliance with checklist question so far.	For CAR, CL and FAR see the definitions above OK is used if the information and evidence provided is adequate to demonstrate compliance with CDM requirements..

Verification Protocol, Table 2 - Resolution of Corrective Action Requests and Clarification				
Corrective action requests and/or clarification requests	Reference to Table 1	Response by project participants	Verification conclusion	
The CAR and/or CLs raised in table 1 are repeated here.	Reference to the checklist question number in Table 1 where the CAR or CL is explained.	The responses given by the project participants to address the CARs and/or CLs.	The verification team's assessment and final conclusion of the CARs and/or CLs.	

Verification Protocol, Table 4 - Forward Action Requests (if no FAR the table 4 is deleted)		
Forward action request	Reference to Table 1	Response by project participants Verification conclusion
The FAR raised in table 1 is repeated here.	Reference to the checklist question number in Table 1 where the FAR is explained.	Response by the project participants on how forward action request will be addressed.

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2.4 Internal quality control

The final validation opinion before being submitted to the client was subjected to an independent internal technical review to confirm that all validation activities had been completed according to the pertinent RINA instructions.

The technical review was performed by a technical reviewer(s) qualified in accordance with RINA's qualification scheme for CDM validation and verification.

2.5 Validation team and the technical reviewer(s)

The validation team and the independent technical reviewer team have the collective competence necessary to perform the validation.

The validation team fulfills the following requirements:

- qualification for all technical area/s (TAs) related to the activity;
- technical experts who provides specific technical, methodological and sectoral knowledge and/or expertise and qualification for TAs can be involved;
- it includes one Team Leader that takes the responsibility to lead the team;
- it includes a Validator and in presence of investment analysis a Financial Expert;
- at least one member who performs the on-site visit is qualified for all TAs related to the activity;
- at least one member who performs the on-site visit is qualified as Team Leader, even if he/she does not cover this role for the specific activity;
- the same person can cover more than one role.

The independent technical reviewer team fulfills the following requirements:

- qualification for the CDM scheme and attendance to specific training related to the independent technical reviewer activity;
- qualification for all technical area/s (TAs) related to the activity in case of Final Report.

The validation team members and the technical reviewers consist of the following personnel (refer to the relevant attachments to see the pertinent qualification certificates):

Role	Last Name	First Name	Site Visit (Yes/No)	Country
Team Leader/ Technical expert T.A 1.2	De Lima Carvalho	Thaís	Yes	Brazil
Validator/ T.A 1.2	Principe	Geisa	Yes	Brazil
Technical Reviewer TA 1.2	Valoroso	Rita	No	Italy

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3 VALIDATION FINDINGS

The findings of the validation related to the project, as described in the PDD version 07 of 18/01/2016 and previous versions /01/, are stated in the following sections.

The validation requirements, the means of validation and the results from validating the identified criteria are documented in more detail in the validation report.

3.1 Project activity details

Project UNFCCC reference	1317	
Date of registration	11/02/2008	
Title of the project activity	Paraíso Small Hydropower Plant - PCH Paraíso	
Methodology(ies)	ACM0002, “Consolidated baseline methodology for grid-connected electricity generation from renewable sources”, version 6 of 19/05/2006 /06/	
Party(ies) involved	Brazil	
Project Participants	Energias do Brasil S/A	

3.2 Reason for permanent changes

The project activity was registered on 11/02/2008 under the approved baseline and monitoring methodology "ACM0002, "Consolidated baseline methodology for grid-connected electricity generation from renewable sources", version 6 of 19/05/2006 /06/. In the previous verification report /07/, 01 FAR was raised during the 2nd periodic verification: The calculation method for the operational margin in the MR is not in accordance to the calculation method required by the PDD. A revision of the monitoring plan shall be in place for the next verification. Therefore, a permanent change from the registered monitoring plan is requested.

3.3 Changes from the registered PDD

Not applicable.

3.4 Changes from the registered Monitoring Plan

PP is requesting a post registration changes in the monitoring plan to update the monitoring of the grid emission factor, using data publicity available by the Brazilian DNA /05/. RINA verified that in the Brazilian DNA web site it is described that the emission factor is calculated based on the "Tool to calculate the emission factor for an electricity system" and also confirmed in the clarification note available by the Brazilian DNA /09/. Brazilian DNA (MCTi – Ministério da Ciência, Tecnologia e Inovação) resolution nº8 of 26th May 2008, defines the Brazilian grid as a unique system and the responsibility of DNA to publish emission factor data, based on confidential data for the energy generation and fuel consumption of all power plants connected to the grid /08/. It can be confirmed in the Brazilian DNA web site that data for the build margin is annually available and for the operation margin is hourly available also consolidated daily and monthly /05/ /10/. RINA verified that level of accuracy and completeness of the monitoring is not

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reduced in the revised PDD since data of the emission factor will be based on official data publicly available by the Brazilian DNA /05/ /10/.

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4 VALIDATION OPINION

RINA Services Spa (RINA) has performed a validation of post registration changes for the project activity “Paraíso Small Hydropower Plant - PCH Paraíso” in Brazil, CDM Registration Reference N° 1317. The validation has s based on the information made available to us.

RINA has performed this validation on the basis of the following documents:

- CDM Executive Board: Clean Development Mechanism Project Cycle Procedure, version 7 of 01/06/2014;
- CDM Executive Board: Clean Development Mechanism Project Standard, version 7 of 01/06/2014
- CDM Executive Board: Clean Development Mechanism Validation and Verification Standard, version 7 of 01/06/2014
- Approved baseline and monitoring methodology ACM0002, “Consolidated baseline methodology for grid-connected electricity generation from renewable sources”, version 6 of 19/05/2006.

It is RINA’s opinion, the changes, as outlined in the revised PDD version 07 of 18/01/2016, from the project activity as described in the registered PDD ensure that the level of accuracy and completeness in the monitoring and verification process is not reduces as a result of the revision; the revisions are in accordance with the applied monitoring methodology and the changes to the project activity comply with the requirements established in the CDM Project Standard.

Hence RINA requests that the post registration changes from the project activity as described in the registered PDD for the project activity “Paraíso Small Hydropower Plant - PCH Paraíso” in Brazil may be considered by the Board.

Sao Paulo, 19/01/2016



Thais de Lima Carvalho
CDM Team Leader
RINA Brasil Servicos Tecnicos LTDA

Genova, 22/01/2016



Laura Severino
Authorized officer signing for the DOE
RINA Services S.p.A



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APPENDIX A

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TABLE 2 RESOLUTION OF CORRECTIVE ACTION REQUESTS AND CLARIFICATION REQUESTS

Corrective action and/ or clarification requests	Reference to Section of the report	Response by project participants	Validation Conclusion
<p>CAR-1</p> <p>In accordance with the <i>Attachment: Instructions for filling out the project design document form for CDM project activities</i> of the CDM-PDD-form, in the section B.6.3 it is requested to <i>Provide a transparent ex ante calculation of baseline emissions, project emissions (or, where applicable, direct calculation of emission reductions) and leakage expected during the crediting period, applying all relevant equations provided in the selected methodology(ies) and, where applicable, the selected standardized baseline(s).</i> However PP did not update the provision to monitor the emission factor data using data from the Brazilian DNA.</p>	Section B.6.3 of the PDD	The section B.6.3 was updated in order to reflect the provision to monitor the emission factor data using data from the Brazilian DNA., stating that “During the project’s crediting period, the Brazilian DNA (MCTi – Ministério da Ciência, Tecnologia e Inovação) became the entity responsible for the publication of the country emission factor (providing both the built margin and the operating margin). Hence, for the ex-post calculation, the emission factor used will be the one provided and available in the MCTi website.”	<p>PDD version 6 was revised accordingly.</p> <p>This CAR is closed</p>
<p>CL-1</p> <p>Section B.8 of the revised PDD was not updated.</p>	Section B.8 of the PDD	The Section B.8 was updated accordingly.	<p>PDD version 6 was revised accordingly.</p> <p>This CL is closed</p>



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TABLE 3 FORWARD ACTION REQUEST

Forward action request	Reference to Table 2	Response by project participants
FAR 1		



RINA

CERTIFICATO DI QUALIFICA QUALIFICATION CERTIFICATE

Si attesta che il sig./sig.ra:
We declare that Mr/Mrs/Ms:

Thais De Lima Carvalho

è qualificato come¹:
is qualified as:

CDM -TEC, -VAL, -VER, -TL

per le seguenti aree tecniche:
for the following technical areas:

1.1, 1.2, 2.1, 13.1

AREE TECNICHE TECHNICAL AREAS	DESCRIZIONE DELL'AREA TECNICA TECHNICAL AREA DESCRIPTION	SCOPO SETTORIALE SECTORAL SCOPE
1.1	Thermal energy generation	1
1.2	Renewables	1
2.1	Electricity distribution	2
13.1	Solid waste and wastewater	13

in accordo alle istruzioni della Divisione Certificazione.
in accordance with the instructions of the Certification Division.

REVISIONE REVISION	DATA DATE	MOTIVAZIONI PER LA REVISIONE REASON FOR THE REVISION
0	19-08-2009	-
12	15-01-2015	Added TA 2.1

Il Resp. QPT
Head of QPT

¹ Legend:

VAL: Validator
VER: Verifier
TEC: Technical Expert
TL: Team Leader
FIN-EXP: Financial Expert
DET: Determiner

CDM: Clean Development Mechanism
VCS : Verified Carbon Standard:
GS: Gold Standard
SCS: SocialCarbon Standard
JI: Joint Implementation

RINA Services S.p.A. è accreditato da UNFCCC, quale Entità Operativa Designata (DOE), per condurre la Validazione e la Verifica di Progetti CDM, da VCSA per condurre la Validazione e la Verifica di Progetti VCS, da GS Foundation, per condurre la Validazione e la Verifica di Progetti GS, da Ecologica Institute per condurre la Validazione e la Verifica di rapporti SCS

RINA Services S.p.A. is accredited by the UNFCCC, as Designated Operational Entity (DOE), to carry out Validation and Verification of CDM Projects, by the VCSA, to carry out Validation and Verification of VCS Projects, by the GS Foundation, to carry out Validation and Verification of GS Projects and by the Ecologica Institute, to carry out Validation and Verification of SCS Reports



RINA

CERTIFICATO DI QUALIFICA QUALIFICATION CERTIFICATE

Si attesta che il sig./sig.ra:

Geisa Maria Principe Branco Saettoni

We declare that Mr/Mrs/Ms:

è qualificato come¹:
is qualified as:

CDM-TEC, VAL, VER, TL

per le seguenti aree tecniche:
for the following technical areas:

1.1, 1.2, 13.1

AREE TECNICHE TECHNICAL AREAS	DESCRIZIONE DELL'AREA TECNICA TECHNICAL AREA DESCRIPTION	SCOPO SETTORIALE SECTORAL SCOPE
1.1	Thermal Energy generation	1
1.2	Energy generation from renewable energy sources	1
13.1	Waste Handling and Disposal	13

in accordo alle istruzioni della Divisione Certificazione.
in accordance with the instructions of the Certification Division.

REVISIONE REVISION	DATA DATE	MOTIVAZIONI PER LA REVISIONE REASON FOR THE REVISION
0	27-08-2009	-
9	17-07-2015	Updating qualification according AS version 6

Il Resp. QPT
Head of QPT

Roma Saettoni

¹ Legend:

VAL: Validator
VER: Verifier
TEC: Technical Expert
TL: Team Leader
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RINA

CERTIFICATO DI QUALIFICA QUALIFICATION CERTIFICATE

Si attesta che il sig./sig.ra:
We declare that Mr/Mrs/Ms:

Rita Valoroso

è qualificato come1:
is qualified as:

CDM -TEC, -VAL, -VER, -TL
TECHNICAL REVIEWER

per le seguenti aree tecniche:
for the following technical areas:

1.2, 13.1

AREE TECNICHE TECHNICAL AREAS	DESCRIZIONE DELL'AREA TECNICA TECHNICAL AREA DESCRIPTION	SCOPO SETTORIALE SECTORAL SCOPE
1.2	Renewables	1
13.1	Solid Waste and waste water	13

in accordo alle istruzioni della Divisione Certificazione.
in accordance with the instructions of the Certification Division.

REVISIONE REVISION	DATA DATE	MOTIVAZIONI PER LA REVISIONE REASON FOR THE REVISION
0	18-01-10	-
9	22-12-2014	Update qualification according to AS ver.6.0

Il Resp. QPT
Head of QPT

¹ Legend:

VAL: Validator
VER: Verifier
TEC: Technical Expert
TL: Team Leader
FIN-EXP: Financial Expert
DET: Determiner

CDM: Clean Development Mechanism
VCS : Verified Carbon Standard:
GS: Gold Standard
SCS: SocialCarbon Standard
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RINA Services S.p.A. is accredited by the UNFCCC, as Designated Operational Entity (DOE), to carry out Validation and Verification of CDM Projects, by the VCSA, to carry out Validation and Verification of VCS Projects, by the GS Foundation, to carry out Validation and Verification of GS Projects and by the Ecologica Institute, to carry out Validation and Verification of SCS Reports