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Date
18.05.2010

Request for Revision of Monitoring Plan

“Central Energética do Rio Pardo Cogeneration Project (CERPA)”

CDM Registration No: 0209

Dear Sir/Madam,

Please find below the validation opinion of TÜV NORD JI/CDM Certification Program to the revision of the monitoring plan for the above mentioned project no. 0209.

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

Yours sincerely,

TÜV NORD JI/CDM Certification Program



Rainer Winter

Validation opinion as per requirement of EB49, Annex 28

Level of accuracy or completeness

- ☒ TÜV NORD herewith confirms that the proposed revision of the monitoring plan ensures that the level of accuracy or completeness in the monitoring and verification process is not reduced.

Additional comment:

Current situation

The project activity consists of increasing the efficiency and capacity of the sugarcane bagasse burning cogeneration facility at Usina da Pedra, a sugar mill that produces sugar and anhydrous and hydrated alcohol and generates its own electricity. The plant uses a high pressure boiler and a multiple stage backpressure turbine coupled with two new 15 MW generators. The total capacity installed at Usina da Pedra is 40 MW. The emission reductions are a result of the displacement of conventional generated energy available in the Brazilian South-Southeast-Midwest grid due to the energy delivered by the project activity.

In the monitoring plan of the registered PDD (version 4B of December 21, 2005), the calibration frequency has been determined yearly and audited by private companies accredited by the national dispatch center. The verification team has been verified in the course of the 4th periodic verification of the monitoring period 2008-01-01 to 2008-12-31 that it is not possible for the PP to conduct the yearly calibration as specified in the registered monitoring plan, because according to the PPA, CPFL (the local power utility responsible for distribution, generation and commercialization of energy) is in charge of calibration of energy meters and not the PP. Taking into consideration the guidelines for assessing compliance with the calibration frequency requirements (EB 52, Annex 60), the project participant is required to revise the monitoring plan as the calibration is not under control of the PP. A request for revision of monitoring plan needs to be submitted. A corresponding CAR has been raised in the verification report.

Revision of the monitoring plan

The parameter whose calibration frequency is revised in the section 'D' of the PDD (version 4C, 2010/04/14) is as follows:

| Data (Indicate table and ID number e.g. 3.1; 3.2.) | Uncertainty level of data (High/Medium/Low) | Explain QA/QC procedures planned for these data, or why such procedures are not necessary. |
|---|--|--|
| 1 | Low | These data will be used for calculate the emission reductions. Two energy meters are used to measure the electricity delivered to the grid (main meter and backup meter). Equipments used to measure the electricity delivered to the grid are calibrated each 2 years following the National Electric System Operator (from the Portuguese <i>Operador Nacional do Sistema Elétrico – ONS</i>) recommendations and procedures ¹ . |

¹Sub-módulo 12.3. Metering System Maintenance for Invoicing (in a free translation from the Portuguese *Manutenção do Sistema de Medição para Faturamento*).

Assessment of the revision

Assuring compliance with the calibration frequency indicated in the registered monitoring plan is not under the control of the PP, but in the responsibility of the local power utility CPFL as per PPA. CPFL follows the recommendation and procedures of ONS (National Operator of the Electrical System) for the Measurement System for Billing. These national standards have the objective to establish procedures for maintenance and inspection, as well as the responsibilities, milestones and deadlines for implementation. One of the procedures is the Sub-module 12.3 – Metering System Maintenance for Invoicing², version 01 of 2009-08-05 that determines the frequency of preventive maintenance shall be a maximum of two years. The preventive maintenance covers the calibration of the meters. Calibration of the main and back up meter has been conducted within an interval of 18 month (11.10.07 and 22.04.09). The calibration certificates were available to the verification team. The errors were within the limits allowed.

Taking into account that

- the approved monitoring methodology does not stipulate any requirements for calibration frequency
- the national ONS standard considers a calibration interval of 2 years adequate to assure correct measurement
- the results of the previous calibrations did not show significant deviations
- the frequency of measurements is not affected
- adequate quality control procedures are in place

the verification team concluded that the level of accuracy and completeness in the monitoring and verification process is not reduced as a result of this revision.

² http://www.ons.org.br/download/procedimentos/modulos/Modulo_12/Submodulo%2012.3_Rev_1.0.pdf . The version of this procedure is adopted by ANEEL (*Agência Nacional de Energia Elétrica* – National Agency of Electrical Energy).

| |
|---|
| <p>Accordance with approved monitoring methodology</p> <p><input checked="" type="checkbox"/> <i>TÜV NORD herewith confirms that the proposed revision of the monitoring plan is in accordance with the approved monitoring methodology applicable to the project activity.</i></p> <p><i>Additional comment:</i></p> <p>The proposed revised monitoring plan correctly follows the applied methodology, i.e. AM0015, version 1 – “Bagasse-based cogeneration connected to an electricity grid“. The approved monitoring methodology does not define a calibration frequency.</p> |
| <p>Previous verification findings</p> <p><input type="checkbox"/> <i>TÜV NORD herewith confirms that the findings of previous verification reports, if any, have been taken into account.</i></p> <p><input checked="" type="checkbox"/> <i>No findings from previous verification period had to be considered.</i></p> <p><i>Additional comment:</i></p> <p>Guidelines for assessing compliance with the calibration frequency requirements were adopted in EB 52. Verification of the previous monitoring period has been concluded before. The need of revising the monitoring plan has been identified in the course of the 4th periodic verification for the monitoring period 2008-01-01 to 2008-12-31.</p> |