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Response to Incompleteness Notification regarding the Request for Registration/Issuance of project “Durban Landfill-gas-to-electricity project – Mariannhill and La Mercy Landfills” (UNFCCC Ref. no. 0545), notification received “20th March 2020”

Dear CDM team,

From our point of view, the notification of incompleteness is not justified. Please find below the response of the TÜV NORD JI/CDM Certification Program to the request for registration/issuance incomplete for the above mentioned project.

With regard to this response, we would kindly request you to continue with the request for issuance process. If that cannot be done, please specify the request for issuance incomplete in more detail to prevent any misinterpretation. If you have any questions do not hesitate to contact us.

Yours sincerely,

Stefan Winter
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Request for Registration/Issuance Incomplete Reason (1)

**Scope and
Issue raised
by the
UNFCCC
Secretariat:**

The DOE is requested to explain how it verified the emission reductions calculation in line with paragraph 372 of VVS-PA:
(a) As per the PDD and the verification report, the Operation of the engine that consumes the LFG is monitored via electricity meters used for parameter EGPJ,y. As per the "raw data and BE calculation spreadsheets" for most of the months, it was observed that when OPengine = 0, BEEC,y is also 0. However, for January 2017, when OPengine = 0, BEEC,y is still considered in the ER calculation. For example, on 26/01/2017, readings from 9:11am to 9:15am show that OPengine = 0, however, BEEC,y is still been calculated and considered in the emission reduction calculations;

**Response by
PP:**

As mentioned in the monitoring report, and as validated by the DOE all electricity values used to claim emission reductions are the ones reported and billed on the monthly invoice from the municipality, eThekwin. The values on the raw data files are only used to crosscheck those on the bills, but not to claim ERs. For the specific month of January 2017, it was identified that for some brief minutes, even though the engine is turned off, there is a recording for BE_{EC}, this could be explained because sometimes when the engine is off, it may still read flow and therefore BE_{EC} readings will follow. Even though these readings are not used to claim ERs, the PP has decided to discount the total tCO₂e that this discrepancy adds up to, from the invoiced electricity: 0.507 tCO₂e. Please find attached new version of the MR and Emission Reduction summary spreadsheets that acknowledge this reduction.

**Response by
DOE:**

DOE has checked all monthly raw data files and processed files and can confirm that the described issue is only appearing for the following times in January 2017:

| Date | From | To |
|------------|-------|-------|
| 26.01.2017 | 09:11 | 09:15 |
| | 09:20 | 09:23 |
| | 09:27 | 09:38 |
| | 10:03 | 10:06 |
| | 10:16 | 10:34 |
| | 10:48 | 11:09 |
| 30.01.2017 | 09:19 | 09:37 |
| 31.01.2017 | 14:39 | 15:07 |

In total the related calculated BE_{EC,y} from the above stated periods sum up to 0.507 tCO₂e or 0.488 MWh. However, as the value to calculate the baseline emissions from electricity generation exported to the grid is determined based on the monthly invoice by eThekwin meter section department the value from the raw data file is taken to crosscheck the value in the invoice. For January 2017 the total MWh-value of power generation in the invoice is 71.210 MWh resulting in 73.577 tCO₂e compared to the total value as per raw data which is 72.400 MWh equal to 74.807 tCO₂e. Even though considering the 0.507 tCO₂e the actual considered amount for this month is lower than that and therefore can be considered conservative 74.300 tCO₂e (74.807 – 0.507) vs 73.577 tCO₂e.

| | |
|--|--|
| | However, the PP has deducted this 0.507 tCO ₂ e from the BE _{EC,y} emission reduction calculation. For this the total emission reductions for this monitoring period are reduced from 79,106 tCO ₂ e to 79,105 tCO ₂ e. MR and Report have been also corrected accordingly and submitted along with this response. |
| Request for Registration/Issuance Incomplete Reason (2) | |
| Scope and Issue raised by the UNFCCC Secretariat: | <p>The DOE is requested to explain how it verified the emission reductions calculation in line with paragraph 372 of VVS-PA:</p> <p>(b) The values for exported electricity (EGPJ,y), imported electricity (ECPJ,y), baseline emissions associated with electricity generation (BEEC,y), project emissions from electricity consumption (PEEC,y), baseline emissions (BEy) and emission reductions (ERy) in the ER spreadsheet (PA0545_ER spreadsheet_8thV) for all months in 2016,2017 and 2018, do not match with the corresponding values in the raw data sheets. For example, in February 2017, as per the raw data and BE calculation spreadsheet, under tab (P02_2017): (i) EGPJ,y = 392.270MWh; (ii) ECPJ,y = 25.423MWh; (iii) BEEC,y = 403.987tCO₂e; (iv) PEEC,y = 26.269tCO₂e; (v) BEy = 3597.813tCO₂e (vi) ERy = 3571.544tCO₂e. However, as per PA0545_ER spreadsheet_8thV under tab 2017_02: (i) EGPJ,y = 392.38MWh; (ii) ECPJ,y = 23.95MWh; (iii) BEEC,y = 405.42tCO₂e; (iv) PEEC,y = 24.75tCO₂e; (v) BEy = 3599.25 tCO₂e (total of SWDS and BEEC,y); (vi) ERy = 3574.50tCO₂e.</p> |
| Response by PP: | The minute readings in the raw and processed data files are taken from pulses from the electricity meters, which converts it to a minute value. The figures used in the summary sheet to calculate the ERs for the month are taken directly from the electricity meter readings at the beginning and end of the month that we get from eThekwini meter section department. |
| Response by DOE: | <p>The electricity generated and exported as well as imported is monitored via related electricity meters. Monthly the eThekwini meter section department collects the related data from the meter reading. They then issue a related invoice to the PP. Based on this invoice the PP receives payment. This invoice is taken as crucial evidence to determine the emission reductions. The minute wise meter readings in the raw data file are taken to crosscheck the invoice value. There are small discrepancies due to the fact that the meter gives minute values and the reading taken directly from the meter. This could be slightly different and on the meter itself it is not shown as detailed.</p> <p>DOE has again crosschecked all monthly invoices (Excel files) by eThekwini meter section department and can confirm that the values are consistent between those and the ER spreadsheet.</p> <p>All monthly invoice files are submitted along with this response.</p> |