

TÜV NORD CERT GmbH • P.O. Box 10 32 61 • 45032 Essen • Germany

CDM team
UNFCCC Secretariat

TÜV NORD CERT GmbH

Am TÜV 1
45307 Essen
Germany

Phone: +49 201 825-0
Fax: +49 201 825-2517

Info.tncert@tuev-nord.de
www.tuev-nord-cert.com

TÜV®

Our / Your Reference

Contact
Stefan Winter
E-Mail: swinter@tuev-nord.de

Direct Dial
Phone: -3329
Fax: -2392

Date
18.11.2021

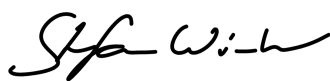
Response to Request For Issuance Incomplete for "Bethlehem Hydroelectric project" - Ref No. 2692, notification received "e.g. 10th November 2021"

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
Head of TÜV NORD JI/CDM Certification Program

Headquarters
TÜV NORD CERT GmbH
Am TÜV 1
45307 Essen
Phone: +49 201 825-0
Fax: +49 201 825-2517
info.tncert@tuev-nord.de
www.tuev-nord-cert.com

Director
Dipl.-Ing. Wolfgang Wielpütz
Dipl.-Oec. Sandra Gerhartz

Registration Office
Amtsgericht Essen
HRB 9976
VAT No.: DE 811389923
Tax No.: 111/5706/2193

Deutsche Bank AG, Essen
BIC (SWIFT-Code): DEUTDE33XXX
IBAN-Code: DE 26 3607 0050 0607 8950 00



Request for Registration/Issuance Incomplete Reason (1)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>VVS-PA, para 355:</p> <p>As per the PDD and section A.1. of the monitoring report, the installed capacity of the project is 5.8MW. However, as per section A.3. of the registered PDD and section B.1. of the monitoring report, the installed capacity of Sol Plaatje unit is 2.5MW and that of Merino unit is 3.6 MW, i.e., total installed capacity of the project is thus 6.1MW.</p> <p>The DOE is therefore requested to clarify how it has verified total installed capacity of the project</p>
Response by DOE:	<p>As per PDD; Section A.1. the installed generator capacity total is 5.8MW. In the section A.3. the technical parameters of the turbines are provided:</p> <ul style="list-style-type: none"> • Sol Plaatje 2.5 MW (turbine rating) • Merino 3.6 MW (turbine rating). <p>As per MR; Section A.1. the installed generator capacity total is 5.8 MW In the section B.1. the technical parameters of the turbines are provided:</p> <ul style="list-style-type: none"> • Sol Plaatje 2.5 MW (turbine rating) • Merino 3.6 MW (turbine rating). <p>As per PRC 2016-08-31 (approved during renewal of crediting period) has a capacity of: Sol Plaatje 2.4 MW (generator rating)+ Merino 3.4 MW (generator rating) = 5.8 MW</p> <p>As per PS for PA §119 (a) (i): “Output” is the installed/rated capacity as indicated by the manufacturer of the equipment or plant, irrespective of the actual load factor of the plant. The installed/rated capacity of renewable electricity generating units that involve turbine generator systems shall be based on the installed/rated capacity of the generator;” (which is given in the data sheet on the generator in kVA (KW = kVA *P.F.).</p> <p>The DOE confirms that all physical features of the registered CDM project activity specified in the registered PDD are in place and that the project participants have operated the project activity as per the latest registered PDD.</p> <p>Therefore no changes to the already submitted documents are required.</p>
Request for Registration/Issuance Incomplete Reason (2)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>VVS-PA, para 360:</p> <p>(a); As per Annex 5 of the PDD, for Sol Plaatje, the electricity production will be measured by electricity meter (main meter), installed at the Panorama substation. However, as per section B.1. of the MR, for Sol Plaatje site, for the period 01/03/2020 – 31/05/2020 of the monitoring period, the source of data generation records used was the Eskom-meter. In doing so, the DOE shall also explain why a PRC is not considered to address the non-compliance as per VVS-PA, para 360</p> <p>(b); As per Annex 5 of the registered PDD, net electricity generated at both Sol Plaatje site and Merino site will be compared to Dihlabeng meters. However, there is no information in the monitoring report or verification report how this was carried out or how the DOE verified this.</p>

	The DOE is requested how it verified the compliance with the monitoring plan as the following have been observed															
Response by DOE:	<p>(a) Sol Plaatje.</p> <p>For the period of 01/03/2020 up to the 31/05/2020 no PPA existed and therefore no invoices were generated.</p> <p>Nevertheless, the power station generated electricity and delivered to the grid. The electricity was monitored by PP and Eskom meters. The electricity delivery to the grid during this period was confirmed by Eskom (Keith Bowen, Wholesaler Manager ,Energy Planning and Market Development,Transmission). The values of delivered electricity confirmed by Eskom were measured by Eskom meter. The Eskom record was used to crosschecked the values measured by PP’s own meters.</p> <p>Meters record:</p> <table><tr><th>period</th><th>PP main meter (MWh) Meter # 43474373</th><th>Eskom meter (MWh) Meter # 43474372</th></tr><tr><td>03/2020</td><td>1,485 .571</td><td>1,485 .797</td></tr><tr><td>04/2020</td><td>1,540. 307</td><td>1,540. 096</td></tr><tr><td>05/2020</td><td>1,568 .121</td><td>1,568 .035</td></tr><tr><td>Total</td><td>4593.999</td><td>4593.928</td></tr></table> <p>The meters at Sol Plaatje are located in the Panorama Station, next to each other.</p> <p>The measurement of electricity production is in line with the monitoring plan. Therefore no changes to the already submitted documents are required.</p> <p>(b)</p> <p>Sol Plaatje,</p> <p>The Sol Plaatje generation data sets were compared with the Eskom metered data sets. The Eskom meter is situated next to the Sol Plaatje meter in the Panorama Substation. The Panorama Substation is located in the jurisdiction of the Dihlabeng Municipality and “Access to the substation is restricted to authorized employees of the Dihlabeng Municipality’s electricity department.” (§ 5.3.1 Appendix 5, PDD version 12), which is why the QA/QC meter is referred to as the Dihlabeng meter.</p> <p>Merino,</p> <p>The Eskom main meter is the source of generation data used in the Merino emission reduction calculations. The Eskom meter is located in the Dihlabeng jurisdiction and hence the reference to the Dihlabeng meter as the QA /QC meter. However, the electricity meters located at the Merino Power Plant are owed by Eskom and not the PP, as provided for in the registered PDD. Hence, no comparison of meter readings was undertaken for Merino as the data sets came from Eskom, an independent third party which is also the state-owned utility.</p> <p>The determination of net electricity generated is in line with the monitoring plan. Therefore no changes to the already submitted documents are required.</p>	period	PP main meter (MWh) Meter # 43474373	Eskom meter (MWh) Meter # 43474372	03/2020	1,485 .571	1,485 .797	04/2020	1,540. 307	1,540. 096	05/2020	1,568 .121	1,568 .035	Total	4593.999	4593.928
period	PP main meter (MWh) Meter # 43474373	Eskom meter (MWh) Meter # 43474372														
03/2020	1,485 .571	1,485 .797														
04/2020	1,540. 307	1,540. 096														
05/2020	1,568 .121	1,568 .035														
Total	4593.999	4593.928														

Request for Registration/Issuance Incomplete Reason (3)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>VVS-PA, para 372:.</p> <p>In ER sheet, sheet "SolPlaatjeData", column G (Consumption data), the formula therein shows that the value is divided by two. For example, for month 12 year 2020, it shows "(1078/2)/1000". The note in the cell states "total reading = 1078 kW for half hour data. Therefore, converted to MWh by dividing by 2 and then again by 1,000".</p> <p>The DOE is requested to explain this calculation and how it verified it</p>
Response by DOE:	<p>For the month 12 year 2020 only net generation measured by L+G meter was provided.</p> <p>During the first few months of installation of the Landis & Gyr meter at Sol Plaatje, the unit of measurement of meter readings were provided in kW. Measurements were aggregated at half hour intervals. Various conversions were applied to present the generated data sets in MWh.</p> <p>Firstly, in order to convert the kW values to kWh, the values were divided by 2. The kWh values were then converted to MWh by dividing by 1,000. This process was applied for the months of December 2019 (with the total reading =(1078/2)/1000) until March 2020. Thereafter the meter readings were provided in kWh and no conversions were necessary.</p> <p>Therefore no changes to the already submitted documents are required.</p>