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Att: CDM Executive Board

Your ref.:  
UNFCCC Ref 1364

DNV responsible ref.:  
PAMAS/TRIKA

Date:  
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QUESTIONS RAISED BY CDM EXECUTIVE BOARD MEMBERS	RESPONSE SUMMARY FROM DNV	ACTION TAKEN ( IF RELEVANT)
<p><b>Q1</b></p> <p>The PP/DOE is requested to clarify why the campaign from 20 July 2006 to 18 February 2007 was selected as baseline campaign considering that one campaign without secondary catalyst was also operated from 26 February 2007 to 17 August 2007 which is closer to the start of the project activity and also considering that the methodology indicates the baseline campaign to be the most recent campaign preceding the start of the project activity. Please refer to AM0034 version 2 (schematic diagram on page 4), Paragraph 82 of VVM v 1.2</p>	<p>A baseline campaign was operated from 20 July 2006 to 18 February 2007, which was used towards ex-ante estimate of emission reduction in the PDDAs confirmed in the validation report /7/, the data from this baseline campaign were not verified by the validating DOE, and the confirmation of the baseline campaign data to be used for ex-post emission reduction calculations was included in the scope of the verifying DOE. After the baseline campaign was completed, the project entity decided not to install the secondary catalyst yet to avoid incurring additional costs while the CDM validation process was still on going. This resulted in an intermediate campaign without secondary catalyst from 25 February 2007 to 18 August 2007. The project was submitted for registration on September 2007, and the first project campaign with secondary catalyst started on 12 September 2007 as the project was likely to get registered during this campaign.</p> <p>DNV has verified the selected baseline campaign data (during the 1<sup>st</sup> verification period), and it was confirmed that operating conditions</p>	<p>DNV has updated the verification report in accordance to the response given.</p> <p>PP has presented the data for the intermediate campaign in an excel sheet. DNV has selected and cross checked a sample of data with print out and scans of daily records from the PP control system. No error was found.</p> <p>DNV has verified the calculation of the baseline emission factor for the intermediate campaign and when compared to the verified baseline emission factor it was found to be higher than the original baseline emission factor and thus the baseline emission factor already verified during the 1<sup>st</sup></p>

	<p>were within the permitted range more than 50% of the time. Therefore, according to the methodology the baseline campaign from 20 July 2006 to 18 February 2007 is valid and does not need to be repeated.</p> <p>Following the baseline campaign, an intermediate campaign was operated without secondary catalyst from 25 February 2007 to 18 August 2007 because the project was not yet registered. According to the methodology (page 4), the baseline campaign shall be established “for one complete campaign prior to project implementation”. Therefore, DNV is of the opinion that it is not required by the methodology to repeat the baseline campaign, nor to use the latest campaign before the project is implemented. Nevertheless, the operating data, stack gas flow and N<sub>2</sub>O concentrations measured during this intermediate campaign can be used to cross check the emission factor for the selected baseline campaign. DNV has verified the raw data and calculation of the emission factor for the intermediate campaign /28/, and can confirm that the selected baseline campaign is the most reasonable and the most conservative baseline for the project activity.</p>	<p>verification period is the most conservative baseline emission factor.</p> <p>Attached to this response is the excel sheets for intermediate campaign raw data and Baseline calculation from intermediate campaign dated 30 November 2011.</p>
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