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CDM team  
UNFCCC Secretariat

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**Response to Incompleteness Notification regarding the Request for Registration/Issuance of project "Cote small-scale hydropower plant" (UNFCCC Ref. no. 0251), notification received on 02<sup>nd</sup> January 2019"**

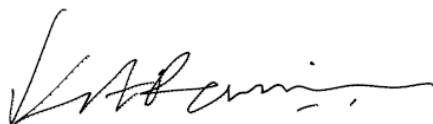
Dear CDM team,

Please find below the response of the TÜV NORD JI/CDM Certification Program to the request for 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,

TÜV NORD JI/CDM Certification Program



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<b>Request for Registration/Issuance Incomplete Reason (1)</b>	
<b>Scope and Issue raised by the UNFCCC Secretariat:</b>	1: The spreadsheet ("Error") shows that 0.2% was applied to the readings of ICE meter from 1 September 2016 to 31 March 2017. The verification report states that "Based on calibration certificates checked a delay in calibration has been identified for the following period: ICE main meter: Start date of delay: 01/09/2016; End date of delay: 31/03/2017." The DOE is required to provide further information on how it verified the application considering that 1) the appendix 6 of the verification report states indicates that the ICE meter were calibrated in 2011 and 2) the verification report identified two delayed periods of 01/01/2013-31/05/2014 and 01/03/2016-31/03/2017 for CNFL main meters."
<b>Response by DOE:</b>	<p>The electricity meter used for the ER calculation is the ICEs one, that's is why the PP applied the 0.2% error to the GAP related to the ICEs meter. Nonetheless, it is important to clarify that such error application was only for conservative reasons, because as per PDD the PP responsibility consist of reporting any electricity measurement discrepancies higher than 0.5% between both ICEs and CNFLs measurements to ICE, but the final decision for calibration or exchanging meter is with ICE. In the discrepancies identified during this MR (February 2014 0.66%, March 2014, 5.86% and August 2016, -1.25%), the ICEs did not calibrate neither exchange the meters, nonetheless the PP (CNFL) replaced its meter on 25/04/2014 to ensure the proper energy metering but also because they had a calibration delay..</p> <p>The maximum permissible error (0.2%) of the CNFL meters was also applied to the 2 calibration delays of its meters, but as per PDD, such electricity values are used only for cross check purposes (between the ICE and CNFL electricity readings) . The values adjusted by the error are calculated by the PP in sheet /error/ column "F" of xls ER calculation . The cross check done between ICEs and CNFL electricity readings after the application of the error shows that the cross check process was correctly applied. This cross check procedure is described in section QA/QC procedures , section D.2 of the MR. Also the verification team describe it in section E.7 of the FVR and in footnotes (*) and (**) in Appendix 6.</p> <p>s</p>
<b>Request for Registration/Issuance Incomplete Reason (2)</b>	
<b>Scope and Issue raised by the UNFCCC Secretariat:</b>	2: The DOE raised CAR02 regarding the difference between measured electricity values between the ICE and CNFL meters during the month of August 2016 and closed it by stating that "It is confirmed that ICE main meter is working properly (with an error below 0.2%) so the application of the maximum permissible error of the meter (0.2%) is in line with per VVS version 1 EB93 §§368-374". The DOE is required to provide further information on how it verified the difference of more than 5 % during March 2014 between measured electricity values between the ICE and CNFL meters.

<p><b>Response by DOE:</b></p>	<p>The issue raised by UNFCCC is related to the round 2 of CAR 01 (not CAR 02).</p> <p>The differences of more than 0.5% (February 2014, 0.66%, March 2014, 5.86% and August 2016, -1.25%) between the measured electricity values from ICE and CNFL meters were calculated as per registered PDD by the PP in sheet /error/ column "H24" of the xls ER calculation. As no calibration is available at the dates of the observed discrepancies, the actual ICE meter error is unknown, but the ICE didn't notify any malfunction of its meter. From his side the PP (CNFL) replaced its meter on 25/04/2014 in order to ensure a good meter performance but also because the CNFL meter has a calibration delay.</p> <p>As mentioned in DOE closing of CAR 01, MR section D.2 and section E.7 of FVR, the PP acted as per registered PDD, the observer discrepancies were reported to the ICE and the final decision to calibrate the meter is on ICE who, did not reported any meter malfunction and did not perform any calibration, also the calibration certificate of ICE meter from 28/03/2011, shows that the meter was working properly the application of the maximum error (0.2%) is considered appropriate. The CNFL (cross-check) meter was replaced on 25/04/2014 instead of calibrating due to the discrepancies vs. the ICE readings, identified in February and March and also because the PP identified the calibration delay. .</p>
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