



**CDM: Form for submission of queries from DOEs to the
Methodologies Panel regarding the application of approved
methodologies (version 01)**

*(To be used by DOEs for presenting questions / proposals / amendments
related to the applicability of approved methodology)*

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| Name of the entity (DOE) submitting this form | DNV Certification AS |
| Reference number and title of the approved methodologies | "GUIDELINES FOR THE REPORTING AND VALIDATION OF PLANT LOAD FACTORS" Annex 11, EB 48 |
| Title/Subject (give a short title or specify the subject of your submission, maximum 200 characters): | Applicability of guidance for 100% equity based wind projects in India |
| Attach CDM-PDD example of project activity where applicability raises problem: | <input type="checkbox"/> Yes, is attached. |
| Date and signature for the DOE | 13 November 2009, Agnes Dudek <i>Agnes Dudek</i> |
| Submitted queries Please use the space below to substantiate the queries relating to the application of approved methodologies. If the questions are related to a project activity under development or implementation, please describe the context in which they arose. If you are proposing amendments to existing methodologies, please specify the text you want to change or introduce. If necessary, attach files or refer to sources of relevant information. | |
| If you have a question relating to the application of an approved methodology, please specify and provide reference to the exact project activity to which it applies. | |

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This is regarding the latest EB guidance on use of PLF for renewable energy projects. The clarification in particular pertains to the wind power projects in India.

As per the guidance “GUIDELINES FOR THE REPORTING AND VALIDATION OF PLANT LOAD FACTORS” Annex 11, EB 48 –

The plant load factor shall be defined ex-ante in the CDM-PDD according to one of the following three options:

(a) The plant load factor provided to banks and/or equity financiers while applying the project activity for project financing, or to the government while applying the project activity for implementation approval;

Case 1:

1. A wind power project is funded all through internal accruals and does not have to seek approvals from Banks/ equity investors.
2. Wind Power projects in India do not require to get approval on PLF values for seeking approval from authorities.
3. Authorities through State Electricity Regulatory Commissions (SERCs) suggest PLF values in their Tariff Orders.

(b) The plant load factor determined by a third party contracted by the project participants (e.g. an engineering company);

1. How does one define “third party”? Can Wind turbine suppliers be considered third party. If yes then whether estimated PLF figures can be used as provided in their proposals (However this could be regarded as inappropriate and unrealistic as wind turbine suppliers’ main intent always would be to sell their machines and PLF provided by them always be on the higher side. Hence relying on this figure would be unrealistic).
2. PP though has the option to get a feasibility done through another party but for the cases which are already up and running and where validation started before the Guidance came, it would not be meaningful since actual performance data would be available for validation.

PP through the letter seeks clarification from the Board on the following -

Whether projects which are funded only through equity and are already under validation can be exempted from the requirement and/or whether PLF data as provided by SERCs/ other reliable sources available in public domain (for ex: government agency reports or independent reports from reputed autonomous agencies) may be used for the analysis.

If you propose an amendment to an approved methodology, please provide reasons.

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NA

In case you propose the amendment to the approved methodologies, please provide your draft below, if not included in an annex:

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NA

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| <i>Date of submission of contribution:</i> | 13/11/2009 |
| Information to be completed by the secretariat | |
| Date when the form was received at UNFCCC secretariat | |
| Date of transmission to the Meth Panel and Executive Board | |

