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Small Scale Working Group

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Revision of AMS-III F to include use of biogas at sales points as fuel

Honourable Members of the Small Scale Working Group,
Dear Mr. Peer Stiansen

Please find our proposal to revise AMS-III F that aims at making the methodology applicable to cases where the upgraded gas is distributed by truck to sales points and sold as fuel. The key elements introduced are following:

- Provision in the applicability section to accommodate (i) the distribution by trucks and (ii) the use of the gas in transportation as additional options.
- Additional project emissions due to the transportation of the gas to the distribution points, e.g. fuel stations.
- An optional monitoring procedure that bases on sampling of feedstock in the facilities of the project activity. The respective equation and provisions to determine its parameters is taken from AMS-III D.

While working on the proposed revision, we realised how interlinked the methodologies AMS-III D, AMS-III H and AMS-III F are. They point in many places to provisions given in the other methodologies. This poses the difficulty that, while revising AMS-III F, provisions also in AMS-III H would have to be revised in order to reflect the introduced applicability options.

In order to avoid such a nested revision of multiple methodologies, we used the wording that “*relevant provisions in AMS-III. H (...) apply for all (...) options listed under 12 (c) accordingly*”. For the sake of usability and consistency, we see merit in a follow-up to explore how common elements could be consolidated into a single separate document, be it an annex or a tool.

Furthermore, we acknowledged the submission SSC_445 regarding co-digestion and drafted our submission in a way that it does not conflict with potential revisions introduced from this parallel request. Hence both submissions could be considered jointly.

With kind regards

Mischa Classen

Senior Project Manager, Regulatory Affairs and Consulting