

 <p align="center">CDM: Form for Submissions on Small Scale Methodologies and Procedures (version 03) <i>(To be used for presenting questions/proposals/amendments related to the simplified methodologies for small-scale CDM project activity categories)</i></p>	
Name:	Mischa Classen Institution: First Climate AG
Affiliation ¹ :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Request for revision of AMS-III.F to include use of biogas through delivery to sale points, and alternative method for baseline calculation
Purpose of the submission:	<input type="checkbox"/> Query on an approved SSC methodology or small scale procedures ² (Fill in field 1. below) <input checked="" type="checkbox"/> Request for Revision of an approved SSC methodology (Fill in fields 2. and 3. below) <input type="checkbox"/> Proposal for a new SSC methodology (Fill in fields 4. and 5. below)
Approved SSC methodologies ² to which your submission relates to, if applicable.	AMS.III.F
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	e-mail: mischa.classen@firstclimate.com , luca.morganti@firstclimate.com Phone: +41 44 298 2882
Information for completing the form Describe the questions related to the SSC Methodologies, Modalities and Procedures below. If the questions are related to a project under development or implementation, you may describe the context in which they arose.	
Query on an approved SSC methodology or SSC procedures	
1. If you have questions relating to the application of an approved small-scale methodology (AMS) please specify and provide reference to the exact technology/measure below. If you have questions related to procedures for SSC project activities please clarify below:	
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Request for revision of an approved SSC methodology	
2. If you are proposing an amendment/revision to an approved small-scale methodology (AMS), please provide justifications below:	

¹ Designated National Authority (DNA); Designated Operational Entity (DOE); Project Participant (PP), and Stakeholder.

² The list of all approved small-scale methodologies (AMS) can be found at <http://cdm.unfccc.int> and go to CDM: small scale CDM methodologies.

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The present request for revision aims at extending the applicability of ACM III F to cases where the biogas is used in gas engines for transportation. In order to achieve this goal, it addresses the following issues:

1) Applicability Conditions.

AMS-III.F states at paragraph 12 that eligible final uses for the biogas include (a) electricity or heat generation on-site, (b) electricity or heat generation after upgrading and bottling, (c) electricity or heat generation after upgrading and distribution (through either a grid without transmission constraints or a dedicated piped network to a group of end users), (d) hydrogen production.

The list, however, does not include the case where biogas is used to generate mechanical energy (e.g. by internal combustion engines). This case has been included with the provision that mechanical energy is generated through combustion, in order to ensure that biogas is fully destroyed in the end use.

Also the list does not cover the case where gas is distributed by truck after upgrading to sales points. The proposed revision introduces this option as “thermal, mechanical or electrical energy generation after upgrading and transportation via truck to one or more sale points, where it is purchased by end users”. The inclusion of such a case appears to be consistent with the already listed uses, given that “upgrading and transportation via truck to one or more sale points” is not conceptually different from transportation via pipeline, apart from the need to account for truck emissions as project emissions. It is also conceptually similar to bottling and selling, the only difference being that transportation to the sales point by truck takes place within the project activity, whereas the bottling may induce additional traffic at the end user side. Clearly, all possible physical leakages from the biogas generation site up to the sale points, as well as the emissions due to the transportation means of the upgraded biogas, are to be accounted for as project emissions.

2) AMS-III.F refers to AMS-III.D for the calculation of “baseline emissions from manure *composted*” (paragraph 17). The fact that AMS-III.D is also to be referred to for the calculation of baseline emissions from manure *anaerobically digested* (rather than composted) by the project activity, seems logical, given that AMS-III.D covers in fact project activities involving anaerobic manure management systems. The present revision makes this issue fully clear by using the word “treated” that applies to both case of composting and anaerobic digestion.

3) AMS-III.F is clearly the methodology of choice for small and medium centralized waste treatment plants where organic matter of various origins can be treated through anaerobic digestion to produce biogas. In case of manure is co-treated, baseline emissions (as mentioned above) are to be calculated according to AMS-III.D. However, the applicability of AMS-III.F for centralized plants faces an operation barrier represented by the fact that some data related to the farms where the manure originates might not be readily accessible to the project participants running the centralized treatment plant. Whereas the location of the farms, the type of animals raised, the type of manure management system are information easily obtainable and likely not to change during the crediting period, the number of animal, the duration of their permanence in the farm and their weight (which are monitored parameters according to AMS-III.D) possibly cannot be monitored directly by the project participant. An alternative approach is therefore proposed in the revision of the methodology, which allows for calculating the baseline emissions from the decay of the manure based on the total measured quantity of volatile solids delivered to the treatment site, rather than on the specific quantity of volatile solids per livestock type. Direct measurements of such parameter, through appropriate sampling are likely more accurate and practical for the project participant, rather than the indirect calculation based on external data on the livestock size.

3. If you are proposing an amendment/revision to an approved small-scale methodology (AMS) please provide the draft methodology with changes highlighted.

<p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Draft methodology with changes highlighted in Word and PDF formats <input type="checkbox"/> PDD in PDF format (optional) <input checked="" type="checkbox"/> Additional information (please specify if you are providing any information note, published paper or a report in support of the request for revision of the SSC methodology) <p>- Cover letter for the submission pack</p>	
Proposal for a new SSC methodology	
4. If you are proposing a new small scale methodology, please provide justifications below:	
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5. For submitting a new small scale methodology a filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" is required.	
<p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Completely filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" in Word and PDF formats³ <input type="checkbox"/> A draft PDD (with sections A to C completed): <ul style="list-style-type: none"> <input type="checkbox"/> Relevant annexes to the PDD are provided <input type="checkbox"/> Additional information (please specify if you are providing any information note, published paper or a report in support of the new SSC methodology) 	
Date you are delivering the contribution:	
Information to be completed by the secretariat	
SSC-Submission number	

³ The current version of the form (F-CDM-SSC-NM) is available on the UNFCCC CDM website (<http://cdm.unfccc.int>).