
 <p align="center">CDM: Form for submission of queries from DOEs to the Methodologies Panel regarding the application of approved methodologies (version 01) <i>(To be used by DOEs for presenting questions / proposals / amendments related to the applicability of approved methodology)</i></p>	
Name of the entity (DOE) submitting this form	TUEV-SUED
Reference number and title of the approved methodologies	ASM-I.D.; ACM0002
Title/Subject (give a short title or specify the subject of your submission, maximum 200 characters):	Determination of relevant electricity grid boundaries in India – state grid vs. regional grid vs. national grid
Attach CDM-PDD example of project activity where applicability raises problem:	<input type="checkbox"/> Yes, is attached. http://cdm.unfccc.int/Projects/TUEV-RHEIN1119626415.04/view.html http://cdm.unfccc.int/Projects/Validation/view.html?ProjectId=778240390341931620&OE=DNV-CUK http://cdm.unfccc.int/Projects/Validation/view.html?ProjectId=Q62SPR0JF4WACTAV1WREB8CUTZI60R&OE=TUEV-RHEIN
Date and signature for the DOE	2005-07-26 Werner Betzenbichler 
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. >> ACM0002 applicability criterion: “The geographic and system boundaries for the relevant electricity grid can be clearly identified and information on the characteristics of the grid is available” ASM-I.D.: No clear reference to grid boundaries	
The links indicated above are giving some examples of PDDs of such projects in India. Our request is caused by the recognition of a non-harmonized approach of project developers and their interpretation of grid boundaries in India. Due to our own experiences and discussions with professionals our Indian validation projects were considering the “regional grid approach” as the appropriate one for that country. The India electricity supply can be divided into five regional grids. The attached file shows a graph giving an example of the coverage of the Southern Grid. Due to a continuing development of interconnections it can be expected that a national grid may become more relevant in some years.	

Now one of our clients, who already submitted projects using another DOE mentioned, that the other DOE was accepting a state grid at the time of the validation. Hence, we made a survey of the Indian renewable energy CDM projects which are already made publicly available for validation purpose or which are even in the stage of requesting registration (1 case, state level approach) or already having been registered (2 cases, both using regional approach). Caused by the fact that project developers show preferences for working with the same DOE the used approach can be directly linked to the DOE's name, although the application is proposed by the project participants.

DNV: national and regional grid

TUEV-SUED: regional grid

TUEV-RHEIN; KPMG; SGS: state grid

This discussion does not include an investigation of conservativeness. It is evident that a state level approach will deliver emission factors on both sides of a more aggregate one.

By this request we would like to get clarification, whether:

- a registration of a project will provide a reference case and the same approach should be applied by all other projects?
- it is acceptable that different approaches can be assessed as being valid in the same host country?
- the extent of the grid will be prescribed by a meth panel recommendation in future?

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

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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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Date of submission of contribution:

2005-07-27

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