 <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:	Institution: Contact: Johan Havinga SenterNovem (today NL Agency), Croeselaan 15, 3521 BJ Utrecht, The Netherlands
Affiliation ¹ :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Clarification regarding applicability of AMSIII.B. to fuel switching at isolated grid connected electricity generation facilities
Purpose of the submission:	<input checked="" type="checkbox"/> Query on an approved SSC methodology or small scale procedures ² (Fill in field 1. below) <input 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.B. Switching fossil fuels (version 14)
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	Andrew.jakubowski@camcoglobal.com , +44 7747 691409 Rachel.child@camcoglobal.com , +44 7810 541019 johan.havinga@agentschapnl.nl , +31 88 6022432, mob: +31 65 268 4715
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.	
<p align="center">Query on an approved SSC methodology or SSC procedures</p>	
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:	

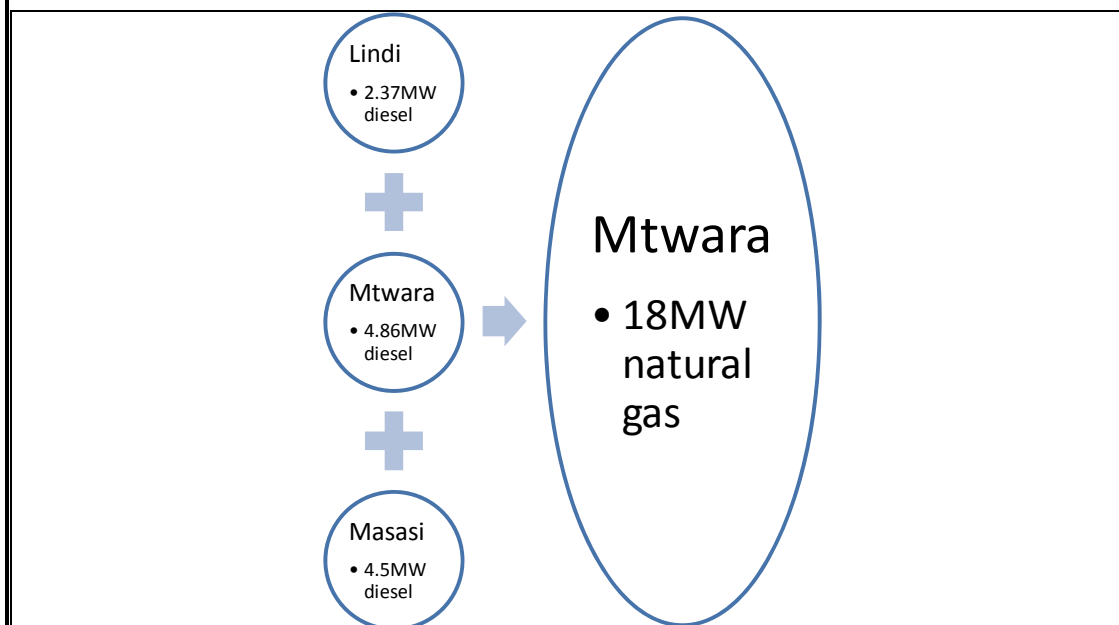
¹ Designated National Authority (DNA); Designated Operational Entity (DOE); Project Participant (PP), and Stakeholder.

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.

This query relates to the application of AMSIIB (version 14) to a fossil fuel switching project in Tanzania, a Least Developed Country which, to date, has only one registered CDM project located in the country. The project involves the replacement of diesel generators in three adjacent regions of Tanzania (Mtwara, Lindi and Masasi) with nine new natural gas gensets located centrally in Mtwara. Further details are given below:

Scenario existing prior to the implementation of the proposed CDM project: 11.73MW of diesel gen sets installed at 3 locations within one region: 4.86MW at Mtwara, 2.37MW at Lindi and 4.50MW at Masasi. Each power plant supplied power to an individual isolated grid in this remote area of south-eastern Tanzania.

Project activity scenario: replacement of the diesel gen sets and capacity increase through the installation of 9 x 2MW Caterpillar natural gas fired gen sets at one central location (Mtwara) and interconnection of the three previously isolated grids into one larger isolated grid.



This clarification is simply to ascertain whether the approved small scale methodology AMSIIB v.14 is applicable to the project described above. Although the methodology does not state that it is not applicable to projects supplying electricity to a grid, we notice that there are no registered projects using AMSIIB v.14 that involve similar types of project.

Version 13 of AMSIIB was used for the GSP version of the PDD for this proposed project and the DOE validating the project was satisfied that the applicability criteria for this methodology were met by the proposed project. However, once version 13 of the methodology expired and version 14 had to be used, the applicability of the methodology for the proposed project was queried by the DOE. However, we note that the original intention of the SSWG in revising the methodology from v.13 to v.14 was to "broaden the applicability" of the methodology (see SSWG meeting report 20, para 6 and EB47 meeting report, para 62(c)). We infer from this that it was not the intention of the SSWG, by introducing version 14, to restrict the use of this methodology for projects that have previously met the applicability criteria of version 13.

Questions/ comments on specific parts of the methodology AMSIIB are outlined below:

Para.	Text from methodology	Clarification requested/ project situation
4	Fuel switching may also result in energy efficiency improvements. If the project activity primarily aims at reducing emissions through fuel switching, it falls into this methodology. If fuel switching is part of a project activity focussed primarily on energy efficiency, the project activity falls under a Type II methodology.	The project will involve efficiency improvements as the new gas gen sets installed are more efficient than the existing diesel gen sets. However, no emission reductions are claimed for this element of the project.
7	The facility may involve grid connected elemental processes however this methodology does not cover emission reductions on account of shift from use of grid electricity.	The facility involves grid connected electricity generation. There is no shift from use of grid electricity

8	This category is applicable to project activities where it is possible to directly measure and record the energy use/output (e.g., heat and electricity) and consumption (e.g., fossil fuel) within the project boundary.	In the case of the proposed project it is possible to directly measure the energy output (i.e. power exported to the grid) and consumption (i.e. natural gas)
9	Heat or electricity produced under the project activity shall be for on-site captive use and/or export to other facilities included in the project boundary. In case energy produced by the project activity is delivered to another facility, or facilities, within the project boundary, a contract between the supplier and consumer(s) of the energy will have to be entered into specifying that only the facility generating the energy can claim emission reductions from the energy displacement.	Electricity produced under the project activity shall be for export to the grid. A contract (PPA) between the project owner (the supplier) and the grid company operator (in this case TANESCO) will be entered into. This will include the requirement that only the facility generating the energy can claim emission reductions from the energy displacement. TANESCO will supply and sell the power to end consumers of the electricity.
13	The project boundary is the physical, geographical site where the switching of energy source takes place. It includes all installations, processes or equipment affected by the switching. The boundary also extends to the industrial, commercial or residential facilities consuming energy generated by the system.	<p>Note that in version 13 of the methodology, "the project boundary is the physical, geographical site where the fossil fuel switching takes place, and all installations affected by the switching".</p> <p>The project boundary for the proposed project is the physical, geographical site where the switching of energy source takes place. The project boundary for the proposed project would include all installations and equipment and affected by the switching. It would also include the connection to the commercial facility that will purchase all the power generated (in this case, the commercial entity is TANESCO, the grid electricity supply company). The boundary does not therefore include the industrial, residential and additional commercial facilities which are supplied with electricity by TANESCO.</p>
14	In case of existing facilities historical information (detailed records) on the use of fossil fuels and the plant output (e.g., heat or electricity) in the baseline captive energy generation plant from at least 3 years prior to project implementation shall be used in the baseline calculations, e.g., information on coal use and heat output by a district heating plant, liquid fuel oil use and electricity generated by a generating unit (records of fuel used and output can be used in lieu of actual collecting baseline validation data). For facilities that are less than 3 years old, all historical data shall be available (a minimum of one year data would be required).	Historical information on the use of fossil fuels (i.e. diesel) and the plant output (i.e. electricity) in the baseline plant from at least 3 years prior to project implementation will be used in the baseline calculations. The baseline plant is connected to an isolated local-grid.
22	<p>Monitoring shall include:</p> <p>(a) Monitoring of the fossil fuel use (FC_y) and output of element process i after the project activity has been implemented ($Q_{P,j,y}$) - e.g., gas use and heat output by a district heating plant, gas use and electricity generated by a generating unit;</p> <p>(b) For electricity/thermal energy exported to other facilities, monitoring of the use of electricity and thermal energy shall be undertaken in the recipient end.</p>	<p>In the case of the proposed project, it is suggested that monitoring shall include:</p> <p>(a) Monitoring of natural gas consumption and power generated by the power plant by the project owner;</p> <p>(b) Monitoring of electricity energy exported and purchased by the single commercial facility (in the case of the proposed project, this will be TANESCO as the grid electricity distribution company) and not at each individual residential, commercial and industrial facility connected to the grid.</p>

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:	
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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 type="checkbox"/> Draft methodology with changes highlighted in Word and PDF formats <input type="checkbox"/> PDD in PDF format (optional) <input 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) 	
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:	14 December 2010
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>).