CDM: Form for Submissions on Small Scale Methodologies and Procedures (version 03)

(To be used for presenting questions/proposals/amendments related to the simplified methodologies for small-scale CDM project activity categories)

Name:	Subhendu Biswas Institution: First Climate (India) Pvt. Ltd.
Affiliation[1]:	☐DNA ☐DOE ☐PP ☒Stakeholder
Title/Subject (max. 200 characters):	Request for Clarification on the Maximum Output Capacity for Renewable electricity generating units with regards to its applicability for AMS-I.D.
Purpose of the submission:	☒ Query on an approved SSC methodology or small scale procedures[2] (Fill in field 1. below) ☐ Request for Revision of an approved SSC methodology (Fill in fields 2. and 3. below) ☐ 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 ID " grid connected renewable electricity generation"
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	Subhendu biswas Subhendu.biswas@firstclimate.com Contact Ph : +913340223456

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:

[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.

>> For type-I project activities, the installed capacity limit is 15 MW electrical output disregarding the actual load factor of the plant. In response to SSC clarification no. 338, the small scale working group has further clarified the output capacity as:

"Therefore, the SSC WG agreed to clarify that the maximum or rated/installed capacity for a small-scale CDM renewable electricity generation projects involving turbine-generator systems can be based on rated capacity of generator in MW (which is an appropriate equivalent of name plate/rated capacity in MVA times name plate/rated power factor, specified by the manufacturer)"

Project Activity:

The project activity in question involves installation of 15 MW renewable biomass based power plant for sale of electricity to the regional grid. The project shall be implemented in two phases :-

Phase – I : Utilizing old plant and machinery at site. These plant and machinery is being bought out from another plant which was no longer in operation prior to the start of project activity. The remaining life of the old plant and machinery will be utilized in the project activity. However due to natural wear and tear of the old machinery, phase-I would not be able to operate at its nameplate capacity but will operate at a lower capacity (*i.e* de-rated capacity). The turbine in this project has been de-rated during due to wear and tear in operation but the alternator capacity remains unchanged. Due to the de-rating of the turbine the overall turbine-alternator combination would become limited to the turbine capacity and thus cannot be utilised to its full potential. At the most, the output capacity would be limited to the de-rated capacity of the turbine.

Further clarification is being provided on the phase-I of the project activity. There is no power generation at the project location prior to phase-I and hence no retrofit (or refurbishment or rehabilitation) is involved. The project has merely bought out old and used equipment which has undergone de-rating due to wear and tear during operation.

Phase-II: Installation of a new turbo-generator, depending on the output of Phase I to makeup to a total capacity of 15 MW, i.e sum of nameplate capacity of phase-II and de-rated turbine capacity of phase-I will be 15MW.

The combined capacity of both the phases shall not exceed 15 MW_e. The de-rated capacity of the turbine in Phase I, which would be certified by the turbine manufacturer/ independent assessor, and rated/installed capacity of turbine/generator in Phase II shall add up to a total capacity of 15 MW. Statutory clearances and permits for the entire plant (phase-I and phase-II) is limited to a capacity of 15MW.

We would also like to clarify that since there was no existing power generation plant in the project location (i.e phase-I and phase-II is coming up at the same time as a new power generation unit), diversion of renewable resources from existing plant to project plant is not relevant.

Thus, in context of the project we would like to clarify the following:

1. As per the guidance stated above, rated capacity of the generator in MW determines the capacity of the plant. However as explained above, in the project scenario the generator is not the limiting capacity. Instead the capacity of phase-I is limited by the turbine capacity. Hence our query is whether the project would qualify within the capacity limits of type-I small-scale project activities since the sum of the capacities of the limiting equipment (turbine in phase-I and generator in phase-II) does not exceed 15 MW.

For all project activities, can the capacity limit be determined on the basis of the limiting equipment (ex: the turbine in phase I of the project activity) instead of the generator as mentioned in the response to clarification request 338.

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.
The following documents have been attached to this form: ❑ Draft methodology with changes highlighted in Word and PDF formats ❑ PDD in PDF format (optional) ❑ 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.
The following documents have been attached to this form: ❑ Completely filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" in Word and PDF formats[3] ❑ A draft PDD (with sections A to C completed): o Relevant annexes to the PDD are provided ❑ 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).