

 <p align="center"><b>CDM: Form for Submissions on Small Scale Methodologies and Procedures (version 03)</b>  <i>(To be used for presenting questions/proposals/amendments related to the simplified methodologies for small-scale CDM project activity categories)</i></p>	
Name:	Ana Paula Beber Veiga Institution: <u>EQAO</u>
Affiliation <sup>1</sup> :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input type="checkbox"/> PP <input checked="" type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	
Purpose of the submission:	<input checked="" type="checkbox"/> Query on an approved SSC methodology or small scale procedures <sup>2</sup> (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 <sup>2</sup> to which your submission relates to, if applicable.	AMS-I.D. (version 16) and AMS-I.F. (version 01)
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	<a href="mailto:ana.veiga@eqao.com.br">ana.veiga@eqao.com.br</a> +55 11 3063-9068
<b>Information for completing the form</b> 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"><b>Query on an approved SSC methodology or SSC procedures</b></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:	
<p>This submission requests clarification on applicability conditions of AMS-I.D. and AMS-I.F. as further detailed below.</p> <p><i>As per the small scale methodology AMS-I.D. version 16, the following is stated:</i></p> <ol style="list-style-type: none"> <li><i>This category comprises renewable energy generation units, such as photovoltaic, hydro, tidal/wave, wind, geothermal and renewable biomass that supply electricity to a national or a regional grid. Project activities that displace electricity from an electricity distribution system that is or would have been supplied by at least one fossil fuel fired generating unit shall apply AMS-I.F.</i></li> </ol> <p>It is the PPs understanding that the second statement of the above paragraph contradicts the first one, given that all technologies supplying electricity to either a national or a regional grid also displace electricity that would be generated by at least one fossil fuel generating unit in the absence of the project. The possible consequence of this interpretation would be that all technologies mentioned in the first sentence would have to apply AMS-I.F.</p>	

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

<sup>2</sup> 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.

*In the other hand, according to the small scale methodology AMS-I.F. version 1, the following is stated:*

1. *This category comprises renewable energy generation units, such as photovoltaic, hydro, tidal/wave, wind, geothermal and renewable biomass that supply electricity to user(s). The project activity will displace electricity from an electricity distribution system that is or would have been supplied by at least one fossil fuel fired generating unit i.e., in the absence of the project activity, the users would have been supplied electricity from one or more sources listed below:*
  - (a) *A national or a regional grid (grid hereafter);*
  - (b) *Fossil fuel fired captive power plant;*
  - (c) *A carbon intensive mini-grid.*
2. *For the purpose of this methodology, a mini-grid is defined as small-scale power system with a total capacity not exceeding 15 MW (i.e., the sum of installed capacities of all generators connected to the mini-grid is equal to or less than 15 MW) which is not connected to a national or a regional grid.*

Project Activities eligible under alternative (a) listed in the first paragraph would also be eligible to AMS-I.D.

These applicability conditions issues concerning both methodologies mentioned above were raised in the context of the renewal of the crediting period of a CDM Project Activity. In this sense, the PPs consider appropriate to describe the baseline and project scenarios.

#### *Baseline Scenario*

In the absence of the project activity electricity would be supplied to a small region by a single fossil fuel fired generation plant, which would likely have its installed capacity increased. The fossil fuelled thermo electric power plant is not connected to the national grid, i.e. the system is isolated.

#### *Project Scenario*

After the implementation of the CDM Project Activity, electricity supplied to the small region started to be provided both by the CDM power plant, which combusts renewable biomass, as well as by the previous fossil fuel power plant, that was not deactivated.

In this context and considering paragraphs mentioned above for both methodologies, PPs seek clarification on the following aspects:

1. What is the definition for national and regional grids? Can an isolated system be considered a regional grid?
2. The project plant was implemented in 2002. In 2001, the fossil fuel thermoelectric power plant that supplied electricity to the city had 9 MW of installed capacity. Therefore, in 2001 the system would qualify as a mini-grid as per the definition above (paragraph 2 of AMS-I.F. version 1). By 2009, the fossil fuel thermoelectric power plant increased its installed capacity up to 20 MW due the increase in the demand by the region, i.e., even without the project activity the installed capacity in the small region would have exceed AMS-I.F mini-grid threshold of 15 MW. The CDM project activity is renewing its crediting period. In this regard, which moment shall be taken into account: the installed capacity of the grid before the implementation of the CDM Project Activity (scenario 1), in a forecasted installed capacity of the small region in baseline scenario (scenario 2), or in the moment the renewal of the crediting period is requested (scenario 3)?
  - a. In the case scenario 1 is deemed appropriate; it is the PPs understanding that AMS-I.F would be the most suitable methodology to be used.
  - b. In the case scenarios 2 and 3 is deemed appropriate; it is the PPs understanding that both AMS-I.D and AMS-I.F would be applicable.

Please clarify.

#### **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:

>>	
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"> <li><input type="checkbox"/> Draft methodology with changes highlighted in Word and PDF formats</li> <li><input type="checkbox"/> PDD in PDF format (optional)</li> <li><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)</li> </ul>	
<b>Proposal for a new SSC methodology</b>	
4. If you are proposing a new small scale methodology, please provide justifications below:	
>>	
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"> <li><input type="checkbox"/> Completely filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" in Word and PDF formats<sup>3</sup></li> <li><input type="checkbox"/> A draft PDD (with sections A to C completed): <ul style="list-style-type: none"> <li><input type="checkbox"/> Relevant annexes to the PDD are provided</li> </ul> </li> <li><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)</li> </ul>	
Date you are delivering the contribution:	15 February 2011
<b>Information to be completed by the secretariat</b>	
SSC-Submission number	

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