CDM: Proposed New Methodology
Meth Panel recommendation to the Executive Board
(version 04)
(To be used by the Meth Panel to make a recommendation to the Board regarding a proposed new methodology)

Date of Meth Panel meeting:	14 - 17 June 2005
Related F-CDM-NM document ID number (electronically available to EB members)	F-CDM-NM0113: "Mondi Gas Turbine Co-generation in Richards Bay, South Africa "
Related F-CDM-NMex document ID number(s) (electronically available to EB members)	F-CDM-Nmex0113: Sarkar / Winkler
Related F-CDM-NMpu document ID number(s) (electronically available to EB members)	F-CDM-NMpu0113: Takao

Note to those completing this form, as applicable: Please provide recommendations on the proposed new baseline and monitoring methodologies based on an assessment of CDM-NMB and CDM-NMM and of their application in sections A to E of the draft CDM-PDD, desk reviews and public input. Please ensure that the form is entirely filled and that arguments and expert judgements are substantiated.

A. Preliminary recommendations by the Meth Panel

I. Recommendation on the proposed new baseline methodology: *(checkmark the choice made)*

Title of proposed new baseline methodology:>> Gas powered combined cycle cogeneration replacing coal based steam generation and grid electricity.

a. To approve this proposed methodology with minor changes

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i. Conditions under which this proposed methodology is applicable to other potential CDM project activities (e.g. project type, region, data availability):

>>

ii. Minor changes:

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b. To reconsider this proposed methodology, subject to required changes

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i. Conditions under which the proposed methodology is applicable to other potential projects (e.g. project type, region, data availability):

>> Suggested changes shown:

- Fuel switching from imported grid electricity to combined heat and power provision to an industrial plant.
- Where the cogeneration plant is owned and run by the plant it provides energy to, or by a third party operator.
- The heat and power provided by the cogeneration plant contributes part of the energy requirements facility it serves.
- Excess electricity is not exported to the grid.

Further conditions to consider:

- The source of synthetic gas, if used, and fuels used to produce it, and general composition, may not change significantly during the project;
- Excess heat from the cogeneration system is not sold to another facility/user;
- Local regulations/programs do not constrain the facility from using coal for steam generation;
- The project activity does not increase the capacity of the final outputs and lifetime of the existing facility;
- The facility would not have major energy efficiency improvements during the crediting period;
- Use of coal is less expensive than natural gas per unit of energy.

ii. Required changes:

>> This methodology is well designed in many ways, and introduces a novel process worthy of close consideration, however a number of major concerns need to be addressed. The issues related to synthetic gas – depending on the technical questions related to its production and use – may ultimately require a further desk review. In particular,

- The use of synthetic gas provides a new element to existing methodologies, and one that is not sufficiently explained. Given that synthetic gas is be produced "upstream" outside of the project boundary and the direct control of project participants it raises a number of concerns that are not adequately addressed by the methodology. In particular:
  - i) A clear definition is of synthetic gas is not provided. It is stated as an applicability condition that "The leakage calculation includes a component that is applied to the production of a synthetic gas equivalent in part to natural gas." However, if synthetic gas is typically a mix of CO and H2, then how can they be equivalent? A chemical definition is needed.
  - ii) A means to establish the production process/source of all synthetic gas is not provided. Synthetic gas can be produced from any fossil fuel, and is often produced from coal, especially in South Africa (where the draft CDM-PDD case takes place). However, there is no provision for ensuring that (in this draft CDM-PDD case for instance) synthetic gas used will only be derived from natural gas. In the draft CDM-PDD case the provider of synthetic gas is SASOL, and since SASOL produces much of its synthetic gas from coal how can it be verified in this case that a) only synthetic gas from natural gas is used and b) that the project does not indirectly increase the production of coal-based synthetic gas (e.g. by increasing overall synthetic gas demand).
  - iii) A sufficient methodology for estimating the emissions associated with synthetic gas is not provided. The CDM-NMB states that "The relationship of the gas used in the project activity to incremental natural gas used in the Synthetic gas production process is verified by external verifiers similar to the emissions of build and operating electricity margins. Upstream emissions from the use of natural gas in the production of the incremental synthetic gas used in the project activity are considered as leakage." It is also stated that a mass balance approach will be used. However, it is unclear whether the "incremental natural gas" is the only GHG emission of a synthetic gas facility. The mass balance approach makes sense in principle for carbon accounting. However, might there be fugitive CH_4 emissions at the facility, other fuels used, electricity used to produce the synthetic gas, and/or other impacts to consider. Perhaps the synthetic gas plant should be included within the project boundary.
  - iv) A rationale for using synthetic gas rather than natural gas is not provided. Why is natural gas not used directly for on-site cogeneration (which is far more common internationally than prior conversion to synthetic gas)? If there are supply constraints, economic rationales, etc., perhaps these should enter into the baseline scenario definition and analysis. Why for instance, is natural gas cogeneration not explored as an alternative baseline (or project) scenario?
- It is noted that "the project activity electricity replaces that generated by coal on site" (Sec B), but

the electricity baseline section makes no mention of displaced on-site electricity generation. It would appear that a central part of the methodology is missing, i.e. a methodology for estimating on-site displaced generation, and for distinguishing that from the grid electricity displaced.

- Furthermore, if the baseline electricity and heat source– or the complementary electricity and heat sources – include cogeneration units, the efficiency of electricity (and heat) generation could change, and thus ex ante estimates may not be appropriate.
- The methodology does not provide for the identification and selection of a most likely baseline scenario. Assuming the project is considered additional, the methodology implicitly assumes the baseline is a continuation of business-as-usual. However, in some situations, the most likely scenario might include equipment changes and/or efficiency improvements that might affect the level of emissions reductions achieved by the project activity.
- It is unclear whether any changes have been made to the tool for demonstration and assessment of additionality. Per EB guidance, any methodology-specific changes should be clearly indicated, and the tool should not be repeated verbatim. The PP should also consider whether project activity-specific changes would be helpful, e.g. similar to text provided in the draft CDM-PDD. For instance, for technological barriers, the draft CDM-PDD includes a flow-chart, which is not included in the CDM-NMB. Since the project participants have developed a means of testing this barrier, this could be considered in the CDM-NMB.
- The methodology is somewhat inconsistent in terms of its additionality methodology. It claims draws on full additionality tool, but in places suggests that only parts of the tool alone are needed. Section B states that "Key tests are the investment analysis and the technical barrier approach" yet this is not reflected in the tool description. Furthermore, Section D.3 opens by stating "The argument for the additionality of the project is based on the technology barrier element"
- It is noted that ACM0002 is modified, but the specific modifications need to be clearly presented and justified (this is not done). Repetition of ACM0002 text is unnecessary and only makes it more difficult to identify the suggested modifications.
- Avoided T&D losses are counted to increase baseline emissions and hence ultimately CERs (D.6, step 3 of the OM). While the rest of the combined margin for the electricity baseline is taken directly from ACM0002, this introduces a new element. No clear methodology is proposed for estimated T&D losses, other than being "supported by documentary evidence". It is important to define how this can be conservatively estimated, taking into account the location of the plant within the grid, and the voltage characteristics of the electricity supply (i.e. to ensure distribution losses are not erroneously attributed to high voltage customers). Furthermore, this should not be applied in the case of captive generation, which the equations in the draft CDM-PDD and CDM-NMB might suggest.

Further to the above, if the above points are addressed in a new submitted methodology, it would be good to improve upon the presentation of text and equations, for example:

- References to specific projects should be avoided per the CDM-NMB guidelines
- Remove redundant text (e.g. D.6 the paragraph on additionality starting "The methodology uses …")
- Rename factors BE_y to separate the electricity baseline ($BE_{y, elec}$) and heat baseline ($BE_{y, heat}$) and reserve BE_y for the total baseline emissions.
- Current formulation includes previously undefined terms (MCEO, which should be GEN_y), etc. The way $EF_{y, T\&D}$ is used here would only count the emissions associated with avoided T&D losses (since Equation 13 subtracts EF_y) which does not seem to be the intention. It is unclear what the term BE_y/Y means.
- All equations need to be numbered consecutively, this is started but not carried through.
- In D.8, the equation for LE_y is repeated; the final term should be in the same notation as other terms; and each new term should be described below the equation (as done for equation 4 and

several others).

- Similarly in D.9, the formula should be ERy = BE_y – PE_y - LE_y

(Project participants shall make required changes to the proposed new methodology and send it back to the Meth Panel. The proposed new methodology will be reconsidered by the Meth Panel if changes required are made by the project participants. The Executive Board will only consider this proposed new methodology after the revised proposed methodology has been reconsidered by the Meth Panel.)

c. Not to approve the proposed methodology

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i. Reasons for non-approval:

>>

(A new proposal should be submitted in accordance with the procedures for submission and consideration of proposed new methodologies of the Executive Board.)

II. Recommendation on the proposed new monitoring methodology: *(checkmark the choice made)*

Title of proposed new monitoring methodology: >> Gas powered combined cycle cogeneration replacing coal based steam generation and grid electricity.

a. To approve this proposed methodology with minor changes

☐

i. Conditions under which methodology is applicable to other potential projects (e.g. project type, region, data availability):

>>

ii. Minor changes:

>>

b. To reconsider this proposed methodology, subjected to required changes

☒

i. Conditions under which the proposed methodology is applicable to other potential projects (e.g. project type, region, data availability.):

>> Suggested changes shown:

- Fuel switching from imported grid electricity to combined heat and power provision to an industrial plant.
- Where the cogeneration plant is owned and run by the plant it provides energy to, or by a third party operator.
- The heat and power provided by the cogeneration plant contributes part of the energy requirements facility it serves.
- Excess electricity is not exported to the grid.

Further conditions to consider:

- The source of synthetic gas, if used, and fuels used to produce it, and general composition, may not change significantly during the project;
- Excess heat from the cogeneration system is not sold to another facility/user;
- Local regulations/programs do not constrain the facility from using coal for steam generation;
- The project activity does not increase the capacity of the final outputs and lifetime of the existing facility;
- The facility would not have major energy efficiency improvements during the crediting period;

- Use of coal is less expensive than natural gas per unit of energy.

ii. Required changes:

>> The key changes are summarized for the baseline methodology, and changes there will require complementary improvements to the monitoring methodology. In doing so, please

- Indicate what is meant by the monitored variable "Global warming potential of synthetic gas", since CO and H2 are not direct greenhouse gases per se;
- Explain how synthetic gas production might be monitored;
- Avoid unnecessary repetition of text already stated in the CDM-NMB.

(Project participants shall make required changes in the proposed new methodology and send it back to the Meth Panel. The proposed new methodology will be reconsidered by the Meth Panel if changes required are correctly made by the project participants. The Executive Board will only consider this proposed new methodology after required changes proposed have been made and the revised proposed methodology has been reconsidered by the Meth Panel.)

c. Not to approve the proposed methodology

☐

i. Reasons for non-approval:

>>

(A new proposal should be submitted in accordance with the procedures for submission and consideration of proposed new methodologies of the Executive Board.)

B. Details of the evaluation of the proposed new methodology by the Meth Panel:

I. Proposed new baseline methodology *(specify title here):* >> Gas powered combined cycle cogeneration replacing coal based steam generation and grid electricity.

(1) Short description of the methodology, including an assessment of which approach from paragraph 48 of the CDM modalities and procedures was used:

a) Describe the methodology:

>> Synthetic gas generated from natural gas with the emissions intensity per unit energy of natural gas equivalent (separately verified) is supplied by pipeline for the production of heat and power using a combined cycle gas turbine. The heat and electricity generated in the project activity is used at the industrial plant partly replacing existing sources of heat and power. The project activity heat replaces that generated by coal on site and the electricity from the project activity replaces that generated by coal on site and that imported from the national grid. The baseline emissions consist of existing actual emissions or historical emissions from the coal fired boilers and the emissions from the production of grid electricity taking into account transmission and distribution losses.

A combined margin methodology is used to calculate the baseline emissions for the electricity component, while the baseline emissions for heat draw on emissions factors for the various fuels. Additionality is established using the additionality tool, with particular emphasis on technological barriers.

b) State the approach selected:

>> The approach selected is as per paragraph 48 (a) of the CDM modalities and procedures: "Existing actual or historical emissions, as applicable.

c) Indicate (in summary form) why the approach selected is the most appropriate. Please provide your expert judgement on the appropriateness of the selected approach to the project category:

>> The approach selected is appropriate.

(2) Basis for determining the baseline scenario:

a) State whether the documentation explains how the baseline scenario is to be chosen and identified:

>> It is described step-wise in the summary description as follows:

- Step 1: establish the alternative to the project activity.
- Step 2: assess which alternatives are plausible.
- Step 3: assess the investment requirements for the project activity base-case.
- Step 4: compare the investment requirements with the alternatives to the project activity.
- Step 5: establish whether the return on the base case is sufficient to allow it to proceed (if so the project activity is the baseline unless there are other barriers.)
- Step 6: assess the project for barriers to implementation (technical, normal practice, availability of finance etc.)
- Step 7: calculate the emissions in the baseline and the project activity.

b) State the basic underlying rationale for algorithms/formulae used (e.g. marginal vs. average basis) (see also section 4 below):

>> For electricity, a combined margin approach is used. Avoided T&D losses are added to this.

The heat baseline considers the fuel consumption * emission factor for each fuel in the baseline scenario and the project activity.

c) State whether the documentation explains how, through the use of the methodology, it can be demonstrated that a project activity is additional and therefore not the baseline scenario. If so, what are the tools provided by the project participants?

>> Yes, it uses the additionality tool.

d) State whether the basis for determining the baseline scenario and for assessing additionality is appropriate and adequate:

>> The identification and selection of the baseline scenario is somewhat incomplete. The summary description in Section B provides only a schematic explanation. These steps are absent from Section D, the methodology itself. It is unclear how baselines other than BAU would be considered in the equations and parameters of the methodology. For instance, if the baseline were an efficiency improvement or boiler replacement at the facility, then presumably the ex ante efficiencies would not be appropriate.

In addition suggestions in places that single parts are sufficient on their own, e.g. section B: “Key tests are the investment analysis and the technical barrier approach” and D.3: “The argument for the additionality of the project is based on the technology barrier element” conflicts with the notion that the full additionality tool should be used.

(3) Assessment of the description of the proposed methodology and its applicability

a) State whether the methodology has been described in an adequate manner:

>> No it has not. For example, the definition of synthetic gas is unclear, as is the methodology for estimating emissions from its production. It is not clearly described as to what is the split between the grid electricity and coal-based electricity generated at site, in the baseline case. The proposed project activity appears to replace both but in the methodology the description is only provided to focus on the baseline case of grid electricity. In the case of electricity baseline the use of a overall grid T&D loss of 10% (as in the draft CDM-PDD) many not be most appropriate approach and may result in higher emissions reductions than what would be the actual baseline which could be more accurately determined given the voltage and line capacity at which electricity is delivered to this integrated pulp and paper plant, from the grid. See part I recommendations above.

Improvements in drafting would include more careful application of approved methodologies, rather than simple cut and paste and consistent numbering and formatting of formulas.

b) State whether the proposed methodology is appropriate for the referred proposed project activity and the referred project context (described in Sections A - E of the draft CDM-PDD and submitted along with CDM-NMB):

>> Yes, it is appropriate in principle.

c) State whether the application of the methodology could result in a baseline scenario that reasonably represents the anthropogenic emissions by sources of greenhouse gases that would occur in the absence of the proposed project activity.

>> To some extent, yes.

Please explain:

>> As noted above, some sources have not been included.

(4) Assessment of algorithms/formulae and type of data needed:

a) State whether the description of the methodology includes algorithms and generic formulae that can be applied to other potential project activities (if not, the proposed new methodology will be considered as a project-specific methodology):

>> Yes, it could be used for other project activities, if concerns above are addressed.

b) Explain the spatial scope of data used to determine the baseline and whether the scope is appropriate:

>> The spatial level of the data is specified in Table 2, E.4. Most of the data is at local scale, with a few national data points, and only emission from natural gas being international. Spatial scope of data is adequate, except that the T&D losses of 10% is for the overall grid but the baseline for this specific project should refer to T&D loss for this particular industrial plant which could actually be estimated more accurately.

c) Explain the vintage of data used (in relation to the duration of the project crediting period) and whether the vintage of data is appropriate, indicating the period covered by the data:

>> The CDM-NMB indicates that consolidated data over the past 3 years prior to the crediting period should be used where possible

(5) Definition of the project boundary related to the baseline methodology:

a) State how the project boundary is defined in terms of:

i) Gases and sources

>> The gases are clearly listed in D.5, and include CO_2, CH_4 and N_2O from combustion on site, as well as "CH_4 leaks" (a good term for fugitive emissions); CO_2 from electricity generation and CO_2 -eq from transportation

ii) Physical delineation

>> A diagram is provided in D.5, but no narrative.

b) Indicate whether this project boundary is appropriate:

>> A narrative description of the physical delineation would help avoid confusion about the project boundary. The diagram is very specific to the underlying project. The project boundary should consider inclusion of the full emissions from the synthetic gas production process.

(6) Key assumptions/parameters (including emission factors and activity levels) and data sources:

a) List the implicit and explicit key assumptions. Identify those, if any, which are problematic and explain:

>> Several important key assumptions are included in the applicability conditions stated by the project participants (See A.1.i above).

b) State whether the key assumptions are arrived at in a transparent manner:

>> Mostly transparent, except in relation to T&D losses and synthetic gas production.

c) Give your expert judgement on whether the assumptions/parameters are adequate:

>> Syngas emissions need to be better characterized per above..

d) Indicate which data sources are used and how the data are obtained (e.g. official statistics, expert judgement):

>> The data sources are listed clearly in E.2, and include IPCC, gas suppliers, T&D authority and many "to be elaborated by PP".

e) Give your expert judgement on whether the data used are adequate, consistent, accurate and reliable:

>> In many cases these are adequate, but sources need to be clearer for T&D losses, synthetic gas production, and other missing items noted above.

f) State possible data gaps:

>> Several per above.

(7) Assessment of uncertainties:

a) State whether the methodology includes an assessment of uncertainties regarding:

i) The basis for determining the baseline scenario:

>> Yes, if the set of plausible alternatives is incomplete.

ii) Algorithms/formulae:

>> Yes, if financial analysis is not conservative.

iii) Key assumptions:

>> As above, plus gas provision in the project activity

iv) Data:

>> No.

b) State whether the uncertainties presented are reasonable:

>> In large part, yes, however uncertainties related to synthetic gas production and T&D losses are not adequately addressed

(8) Leakage:

a) State how the baseline methodology addresses any potential leakage due to the project activity:

>> Emissions from the use of the incremental natural gas at a synthetic fuel plant, fugitive CH_4 emissions from gas transmission and CO_2, CH_4, and N_2O emissions from coal and ash transportation are categorized as leakage. Emissions from fuel transportation are counted only if the fuel is transported in a non-Annex I country.

b) Indicate whether the treatment for leakage is appropriate and adequate:

>> Per above, emissions from synthetic gas production are not adequately treated. Upstream gas transmission leakage has not been adequately addressed. Physical leakage estimation relies mainly on average default leakage guidelines of the IPCC.

(9) Transparency and "conservativeness":

a) Indicate whether the baseline methodology was developed in a transparent way:

>> Yes, in most aspects, the methodology is transparent.

b) State whether the baseline methodology is conservative:

>> Not necessarily. Using grid average T&D losses (in the draft CDM-PDD case) likely overstates losses

and emission reductions. On the other hand neglecting on-site coal based electricity generation is conservative, though it appears to be an error.

(10) Potential strengths and weaknesses of the proposed baseline methodology *(please explain)***:**

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Strengths:

- The methodology draws on approved methodologies, notably ACM0002 "Consolidated methodology for grid-connected electricity generation from renewable sources"; AM0008 "Industrial fuel switching from coal and petroleum fuels to natural gas without extension of capacity and lifetime of the facility"; AM0014 "Natural gas-based package cogeneration"and the "Tool for the demonstration and assessment of additionality".
- The methodology allows for the use of syngas as equivalent to natural gas, but would be applicable in cases where only natural gas is used.

Weakness:

- See part A.I recommendations above.

(11) Other considerations, such as a description of how national and/or sectoral policies and circumstances have been taken into account *(please explain)***:**

>> The CDM-NMB refers to accounting for South African regulations. All project specific information should not be included in the CDM-NMB (only in the draft CDM-PDD).

(12) Applicability of the proposed methodology across project types and regions *(please indicate)***:**

>> Unclear until major concerns are addressed..

(13) Any other comments:

a) State whether any other source of information (i.e. other than documentation on this proposed methodology available on the UNFCCC CDM web site) has been used by you in evaluating this methodology. If so, please provide specific references:

>> None.

b) Indicate any further comments:

>> No further comment.

II. Proposed new monitoring methodology ***(specify title here):*** **>>** Monitoring methodology for gas-powered combined-cycle cogeneration replacing coal-based steam-generation and grid-electricity

In respect of the proposed new monitoring methodology, evaluate each section of CDM-NMM to the draft CDM-PDD. Please provide your comments section by section:

(1) Brief description of new methodology:

Describe new methodology:

>> The methodology requires monitoring of the quantity of natural gas used in the combined heat and power plant and monitoring the quantities of both heat and power that are provided for the operations. The amount of heating and electricity provided in the project activity can then be used to estimate the emissions from the baseline electricity and heat sources. The grid emission factor and parameters needed to calculate the combined margin are monitored. T&D losses and other aspects of grid operation are also included. Fuel efficiency are either measures *ex ante* or in the case of the natural gas, "early".

(2) Key assumptions/parameters:

a) List the implicit and explicit key assumptions. Identify those, if any, which are problematic and explain:

>> The combined cycle gas turbine at the facility would use synthetic gas. It has been assumed that in terms of emissions intensity per unit energy is equivalent to natural gas. This assumption needs to be

substantiated by clear evidence or monitoring (analysis of contents). Gas transmission leakage is also physical leakage and can be calculated using the difference between what the synthetic gas plant dispatches and what the project facility receives. Should the relationship between natural gas and synthetic gas change, emission factor of gas will change accordingly.

The T&D loss (used in the daft CDM-PDD) applies for the overall national grid. It would be incorrect to use this as the factor for inflating the emission reduction from project activity because, high voltage consumers of the grid (such as industries like the integrated pulp and paper plant) are closer to the generation center and thereby entail lower T&D losses compared to that of the low voltage consumers or that of the average T&D loss factor for the grid. See discussion in CDM-NMB above

b) State whether the key assumptions are arrived at in a transparent manner:

>> The key monitoring assumptions are mostly transparent – see baseline comments above.

c) Give your expert judgement on whether the assumptions/parameters are adequate:

>> Generally adequate,

In Table B.2.1 and / or B.4.1, a factor indicating the shares of NG and syngas might be included.

The CDM-NMM could be improved by defining "early", e.g. within the first 3 months of project operation.

In Table B.2.3, it should read "electricity *imported* from the grid" not exported. .

The detailed repetition of the CDM-NMB steps for the combined margin (section B.2.4) seems unnecessary.

(3) Data sources and data quality:

a) Indicate which data sources are used and how the data are obtained (e.g. official statistics, expert judgement):

>> Several data variables are measured.

b) Give your expert judgement on whether the data used are adequate, consistent, accurate and reliable:

>> Yes, but for the issues not addressed per above.

c) *State possible data gaps:*

>> Shares of syngas and natural gas.

(4) Assessment of the description of the proposed methodology and its applicability:

a) State whether the proposed methodology has been described in an adequate manner:

>> The CDM-NMM is generally adequately described.

b) State whether the proposed methodology is appropriate for the referred proposed project activity and the referred project context (described in Sections A - E of the draft CDM-PDD and submitted along with CDM-NMM):

>> In principle, yes.

c) State whether this proposed monitoring methodology is compatible with the proposed baseline methodology described in CDM-NMB of the draft CDM-PDD:

>> Yes.

(5) Leakage *(please elaborate, if appropriate)***:**

>> As with the CDM-NMB, the methodology for estimating synthetic gas emissions needs to be improved. Also the emissions associated with natural gas transport should be monitored, if positive leakage from avoided emissions from coal transport are to be counted.

(6) Quality assurance and control procedures *(please explain)***:**

>> The Quality Control and Quality Assurance procedures are integrated with the existing ISO 14001 system which describes the method of data collection and reporting. This is adequately considered in B.7;

however, the project participants should clarify “PI system”.

(7) Potential strengths and weaknesses of the proposed monitoring methodology *(please explain)***:**

>>

Strength:

- Includes a wide range of parameters to be monitored.

Weaknesses:

- Precise QC and QA procedures are lacking from the monitoring methodology.
- The methodology uses default parameters where it is possible to monitor project specific data.
- Several of the monitoring data will come from third party entities or third party verifiers which renders the methodology weak.

(8) Applicability of the proposed methodology across project types and regions *(please indicate)***:**

>> Unclear until improved

(9) Any other comments:

a) State whether any other source of information (i.e. other than documentation on this proposed methodology available on the UNFCCC CDM web site) has been used by you in evaluating this methodology. If so, please provide specific references:

>> None.

b) Indicate any further comments:

>> No further comments.

Signature of Meth Panel Chair ……..

Date: 22/06/2005 *Jean-Jacques Becker*

Signature of Meth Panel Vice-Chair ……..

Date: 22/06/2005 *(name)*

Information to be completed by the secretariat	
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