

 <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:	Subhendu Biswas Institution: First Climate (India) Private Limited
Affiliation ¹ :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input type="checkbox"/> PP <input checked="" type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Clarification of eligible electricity in case of co-firing of fossil fuels in biomass project activity
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-I.C, AMS-I.D
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	Subhendu.biswas@firstclimate.com
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.

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AMS-I.C, AMS-I.D and AMS-I.F require that for **project activities** involving installation of plants capable of co-firing biomass and fossil fuel, the energy generation is to be proportioned based on the amount of biomass / fossil fuel consumed and specific fuel consumption for biomass / fossil fuel which is to be specified *ex-ante*. However, following are the observations with respect to application of methodologies AMS-I.D and AMS-I.C to co-fired projects.

As per AMS-I.C, paragraph 42: *“For the co-fired systems, baseline emissions calculated as per paragraph 31 shall be compared with the baseline emissions calculated as per paragraph 41. The lower of the two values shall be used to calculate emission reductions.”* paragraph 31 in turn relates to a situation where the **baseline** is a co-fired plant (corresponding to scenario 15(h) of AMS IC). Hence for **project activities** where the **baseline scenario** is not a co-fired plant (eg. solely fossil fuel fired unit) paragraph 42 does not have any relevance.

As per methodology AMS I.C the specific energy generation for each type of fuel (biomass or fossil) is to be specified *ex-ante*. But the equation (number 10) used for determination of the same ($SEC_{j,PJ,y,measured}$) involves parameters which are monitored *ex-post*, eg. Quantity of fuel type combusted in the **project activity in year y**, Average net calorific value of fuel type j **combusted during the year y**.

For AMS-I.D, as per monitoring table (Para 22): *“The net electricity export/supplied to a grid is the difference between the measured quantities of the grid electricity export and the import. If applicable, cross check net electricity supplied to a grid as gross energy generation in the project activity power plant minus the auxiliary/station electricity consumption, technical losses and electricity import from the grid to the project power plant measured at the grid interface/connection used for billing purposes”*. Please note that for co-fired projects this cross-check mechanism is not feasible. For co-fired projects the monitored electricity delivered to the grid as mentioned above will not match with the adjusted gross electricity generation based on the monitored amount of fossil fuel consumption and specific energy consumption of the fuel (it will always be higher). In case of co-fired projects the applicable gross generation from project can be derived (calculated and considering the conservative figure) as per provisions provided in point 6 of Table 1 of the methodology. The auxiliary electricity consumed can be conservatively assumed to be entirely from biomass and hence the qualifying net electricity generation can be calculated by deducting the auxiliary electricity consumption from the calculated gross energy generation (adjusted) from biomass consumption as per point 6 of Table 1. This approach is already built-in in AMS-I.F which states that *“The net electricity displaced is the gross energy generation by the project activity power plant minus the auxiliary/station electricity consumption”*. The amount of net power measured at the grid interface need not be monitored as it is not relevant for calculating emission reductions in the project.

We seek clarification on the following points:

- Relevance of paragraph 41 and 42 for co-fired project plant under AMS-I.C where the baseline is not a co-fired plant
- Mechanism to determine specific energy consumption for each type of fuel *ex-ante* for a co-fired project
- Whether we can use the approach indicated in AMS-I.F for determination of net power generated from co-fired project activities under AMS-I.D and conclude that cross checking mechanism (as specified under point no. 05 of table 01 of AMS-I.D) is not relevant for co-firing projects.

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:	05/02/2011
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>).