

 <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>	
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Affiliation ¹ :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Revision of AMS-I.D's classification for intermittent and non-dispatchable nature of power generation activities and related combined margin calculation.
Purpose of the submission:	<input type="checkbox"/> Query on an approved SSC methodology or small scale procedures ² (Fill in field 1. below) <input checked="" 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.D - Grid connected renewable electricity generation (Version 16)
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	gustavo.ribeiro@eqao.com.br focalpoint@eqao.com.br Phone: +55 11 3063-9068
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: >>	
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:	

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.

Regarding the calculation of the combined margin emission factor and the most appropriate weights values for operating margin (OM) and build margin (BM), the methodology AMS I. D. refers to the “Tool to calculate the emission factor for an electricity system” (page 16, Step 7) which establishes:

- “• *Wind and solar power generation project activities: $w_{OM} = 0.75$ and $w_{BM} = 0.25$ (owing to their intermittent and non-dispatchable nature) for the first crediting period and for subsequent crediting periods;*
- *All other projects: $w_{OM} = 0.5$ and $w_{BM} = 0.5$ for the first crediting period, and $w_{OM} = 0.25$ and $w_{BM} = 0.75$ for the second and third crediting period, unless otherwise specified in the approved methodology which refers to this tool.”*

Considering the intermittent and non-dispatchable nature of run-of-river Small Hydroelectrical Power (run-of-river SHP) plant and the low predictability of project output of this kind, characteristic also acknowledge and considered by AMS-I.D at paragraph 15:

“(…).hydro, solar, wind, geothermal, wave and tidal plants where power generation can vary significantly from year to year, due to natural variations in the availability of the renewable source (e.g., varying rainfall, wind speed or solar radiation (...)).”

It seems necessary to revise the methodology improving its coherence. In order to do so, the default values used for wind and solar power generation should be extended to hydro (run-of-river SHP), geothermal, wave and tidal power generation project activities. Therefore to properly adequate the methodology AMS I. D. “Grid connected renewable electricity generation” we propose the inclusion of a footnote referring to paragraph 12 (a):

(a) A combined margin (CM), consisting of the combination of operating margin (OM) and build margin (BM) according to the procedures prescribed in the ‘Tool to calculate the Emission Factor for an electricity system’⁷.”

“⁷For hydro (run-of-river Small Hydroelectrical Power), solar, wind, geothermal, wave and tidal power generation project activities under the present methodology the following CM and BM weights should be use: $w_{OM} = 0.75$ and $w_{BM} = 0.25$ (owing to their intermittent and non-dispatchable nature) for the first crediting period and for subsequent crediting periods.”

In the specific case of hydro power generation a type limitation becomes necessary since hydropower plants with storage reservoir are not subject to river flows variability as run-of-river SHP plants. Evidence demonstrating intermittent and non-dispatchable nature (similar to wind power plants) of run-of-river small hydropower plants can be supplied if necessary.

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 formats³
- ☐ A draft PDD (with sections A to C completed):
 - ☐ 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:

October 22nd, 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>).