

 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>	
Name:	Mark Verlohr Institution: Veolia Propreté
Affiliation ¹ :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Clarification on applicability of GUIDELINES FOR DEMONSTRATING ADDITIONALITY OF RENEWABLE ENERGY PROJECTS <5MW & ENERGY EFFICIENCY PROJECTS WITH ENERGY SAVINGS <20GWH PER YEAR to landfill gas projects
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.D (renewable energy part of ACM0001), AMS III.G
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	mark.verlohr@veolia-proprete.fr tel. +33 1 46 69 32 14
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.	

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.

Query on an approved SSC methodology or SSC procedures
<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>
<p>I. CONTEXT:</p> <p>The „GUIDELINES FOR DEMONSTRATING ADDITIONALITY OF RENEWABLE ENERGY PROJECTS =<5MW AND ENERGY EFFICIENCY PROJECTS WITH ENERGY SAVINGS =<20GWH PER YEAR" specify that project activities¹ whose primary technology is the generation of renewable energy are considered additional if they fulfil any of the conditions laid down in articles 2(a) to 2(d) of the GUIDELINES.</p> <p>According to the definitions applied within the CDM, electricity or thermal energy generated from landfill gas is considered renewable (EB23, Annex 18, Art. 5). However, the technology used in landfill gas engines is an inseparable combination of renewable energy generation and methane destruction: CH₄ in the landfill gas is destroyed in the engine and simultaneously converted into electricity².</p> <p>II. REQUEST FOR CLARIFICATION:</p> <p>Clarification is sought on whether the generation of renewable energy via landfill gas engines is considered a "primary technology" and thus the GUIDELINES apply to projects with energy recovery from landfill gas up to a limit of 5MW installed capacity: e.g. as a stand alone project under AMS I.D claiming CERs for energy recovery or in combination with AMS III.G or ACM0001 claiming CERs for both methane destruction and energy recovery.</p> <p>In the past, the methodologies applicable to landfill gas projects put activities which used landfill gas as a renewable resource at a disadvantage to those that only destroyed the landfill gas. Indeed even in cases where no CERs were claimed for energy recovery (substitution of electricity from the grid), landfill gas projects with energy recovery had to prove financial additionality in detail, while projects with methane destruction only were inherently additional (the only source of revenue are CERs).</p> <p>As a result, landfill gas project developers may not have considered energy recovery in order to facilitate the demonstration of additionality of the project. This is especially the case, as methane destruction (GWP 21) contributes the vast majority of CERs to a landfill gas project, but represents less investment than renewable electricity generation via landfill gas engines.</p> <p>In addition to the above, further clarification is sought on article 2(c) and 2(d) of the GUIDELINES:</p> <p>2(c): What justifications are necessary to prove that the electricity generated by the project activity is distributed to households, communities or SMEs? Does an electricity purchase agreement with a municipality satisfy the requirement?</p> <p>2(d): What justifications are necessary to prove that a renewable energy technology is recommended by the host country DNA and approved by the Executive Board as additional? Does the secretariat dispose of a list of eligible technologies per country?</p> <p>¹ In its 57th meeting, the Executive Board of the CDM decided that the GUIDELINES are applicable to all project activities regardless of their scale (small and large scale).</p> <p>² This is one single technology, even though for security and odour control reasons it is generally necessary to have backup flares on the landfill in order to be able to destroy any excess gas and to guarantee safe methane destruction when an engine is on maintenance.</p> <p>>></p>
Request for revision of an approved SSC methodology
<p>2. If you are proposing an amendment/revision to an approved small-scale methodology (AMS), please provide justifications below:</p>
<p>>></p>
<p>3. If you are proposing an amendment/revision to an approved small-scale methodology (AMS) please provide the draft methodology with changes highlighted.</p>

<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:	13/12/2010
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>).