



CDM: Recommendation Form for Small Scale Methodologies (version 01)
(To be used for presenting questions/proposals/amendments to the simplified methodologies for small-scale CDM project activity categories)

<i>Date of SSC WG meeting:</i>	21–24 June 2011, SSC WG 32
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Revision of AMS-II.I for a project involving the optimization of fuel-gas consumption in a coke oven
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMS-II.I “Efficient utilization of waste energy in industrial facilities”
<i>Name of the authors of the query:</i>	Yasuki Shirakawa / Kunihiro Ueno / Naoki Matsuo Institution: Climate Experts, Ltd. y_shirakawa@climate-experts.info , k_ueno@climate-experts.info , n_matsuo@climate-experts.info

Summary of the query:

Please use the space below to summarize the query related to SSC methodologies/categories SSC Modalities and Procedures provide recommendation/analysis of the SSC WG.

Original text from Stakeholder

Brief description of the request for revision

A revision is proposed to add a sentence in paragraph 1 of AMS-II.I version 01 to let PP understand more clearly the applicability of the methodology.

Description of the project activity

The main purpose of the proposed project activity is to generate electric power using recovered coke oven gas (hereinafter referred as “COG”) by reducing heat consumption in coke oven, and to substitute grid electricity. The heat consumption reduction is to be achieved by applying the Automatic Combustion Control System (hereinafter referred as “ACCS”). The project activity consists of the following components and logical sequence:

1. Control and reduction of fuel gas consumption in coke oven during coking process, preventing over-heating by monitoring through ACCS, which can monitor and indicate adequate coking cycle.
2. Electric power generation through a steam turbine power generation system using COG
3. Providing generated electricity to the public power supplier or reduction electricity supplied from the public power supplier
4. The public power supplier’s reduction of CO₂ emission in accordance with the power reduction

Please refer to the attached PDD in details.

The request for revision

We propose two revisions for the current version of the methodology. One is regarding applicability of the methodology, and another one is about data used for calculating the baseline emissions.

Scrutinizing the “technology/measure” specified in the methodology in paragraph 1 in its current form, it

may be possible to evaluate that the methodology is applicable to the above proposed project activity. However, there is no definition written regarding “improve the efficiency of electricity or thermal energy generation” or no explanation how the efficiency improvement can be obtained, except an example of TRT written in the paragraph. For this purpose, a revision is proposed to add a sentence in paragraph 1 to let PP understand more clearly the applicability of the methodology, and can be applied to the proposed project activity. The proposed revision to the approved methodology AMS-II.I version 01 with changes highlighted is attached together with this submission.

The current methodology requires that minimum of 3 years historical data are necessary to calculate the baseline emissions. However, even if we have 3 years historical data, it is not easy for every candidate projects to prepare these data meeting with the strict protocols of the validation. Therefore, we would like to propose to allow “The baseline monitoring campaign” in the methodology. The baseline monitoring campaign can determine energy generation or production output of the existing facility, and the period should ensure the accuracy and conservativeness of these parameters, e.g. 1 year.

Recommendation by the SSC WG:

Please use the space below to provide amendments/change (in your expert view, if necessary).

Please refer to paragraph 10 of the meeting report of the SSC WG 32
<http://cdm.unfccc.int/Panels/ssc_wg>.

Answer to authors of query by the SSC WG:

Please use the space below to provide answer to the authors of the above query.

The small-scale working group of the CDM Executive Board would like to thank the author for the submission.

The SSC WG agreed not to recommend the revision as the group noted that energy savings claimed through the optimization measures would be difficult to distinguish from other external variables that influence the complex reaction process in the coke oven battery/process and that it would be challenging to establish a baseline under the small-scale methodological framework.

It is understood from the submission that the purpose of the project activity is optimization of coking time thereby reducing the COG gas consumption within the coke oven battery solely through control/instrumentation systems. The rationale on which the AMS-II.I is developed is to replace an inefficient type of equipment with a new one, for example, energy savings via replacement of a wet-type dust removal system by a dry-type system prior to a top gas pressure recovery turbine (TRT). The SSC WG is of the opinion that the methodology is incapable of tracking the kinds of dynamics inherent in process optimization as to be able to link accurately cause to effect. It may be difficult to transparently establish that the COG saved and used for power generation is coming solely from the process optimization actions, as other dynamics of the process may also contribute to the savings, and are not linked to the project activity, the implementation of the ACCS control system. Therefore, the methodology in its current form may be inadequate to capture the necessary essentials of this kind of emission reductions projects. Furthermore, the monitoring protocol included in the methodology is likely to be inadequate to transparently monitor this kind of emission reductions project as to be able to comprehensively take into consideration the requirement in the methodology that “The impact of the measures implemented (improvements in energy efficiency) by the project activity should be clearly distinguished from changes in energy use due to other variables not influenced by the project activity (signal to noise ratio)”.

Signed by the Chair, Ms. Fatou Gaye

Date: 24/06/2011

Signed by the Vice-Chair, Mr. Peer Stiansen

Date: 24/06/2011

Information to be completed by the secretariat

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