**Comment 1**  
31-08-05 2:02pm  
Name: Axel Michaelowa  
City: Hamburg  
Organisation: Hamburg Institute  
Country: Germany  

1. The category chosen is wrong as the power is wheeled through the grid and displaces grid power at the buyers' sites, which are situated at a distance from the power plant. Thus category I.D should be used.  
2. If the plant can use both coal and biomass and is run in an economically rational way, biomass will only be used if it is cheaper than coal. Thus the additionality argument is flawed.

**Comment 2**  
09-09-05 10:59am  
Name: S.K. Shukla  
City: Raipur  
Organisation: Chhattisgarh Renewable Energy Development Agency  
Country: Chhattisgarh  

As the PDD described, its a grid interface power project which will be using the state grid for transmitting its power to its associate companies. hence the project can not be covered under the category AMS I-A rather it should be covered under category AMS I-D.  

Further the base line approach adopted for determining the no of CERs seems to be very optimistic. The project will fed its power to the state grid and the grid will be transmitting it to its associate companies which is a third party sale agreement. The PPA approved by the state electricity board envisages the purchase of surplus power by the state utility (CSEB) at a predetermined rate. So the base line apporach as prescribed under Appendix B, category AMS-I.D seems to be more appropriate adhering to the more conservative approach for calaculation of Carbon Emission Reductions (CERs).  

As per the Ministry of Non-conventional Energy Sources (MNES), the project may use 25% of conventional fuel such as coal for continious operation of the plant throughout the year. The same should also be taken into account while computing the Carbon emmisssion reductions which is also be a conservative apporach for calculating CERs.  

The projects of similiar capacity are entitled to achive around 2 to 2.5 lacs of CERS where as the project's emmission reduction certificate is arrived at about 5.61 Lacs which seems to be very high in the present scenerio.