

Comment 1

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The following are my observations on the project.

Possibility of double counting:

The following line is the excerpt from the PDD on page no:3 "Due to saving in fossil fuel the amount of emission from per unit of clinker is also reduced".

Under this assumption if the project of Binani Cement has applied for CDM registration under ACM 0005, principally the fly ash addition etc in the cement manufacturing process reduces the fossil fuel consumption which in turn claimed for CER and how does the monitoring of the cooler improvement and the fly ash addition will be demarcated. There is possibility of this 12000 credits is an inbuilt function of what claimed under ACM 0005 by the same project participant. Which in other case does this cooler efficiency has taken care in the earlier project.

Applicability of the Methodology:

Under the category of AMS II D "The aggregate energy savings of a single project may not exceed the equivalent of 15 GWhe per year. Which in my opinion the PDD has not expressed anywhere, the CER calculation file attached was highly discrete.

What was the total energy GWhth saved per annum and quantity of coal/pet coke saved is not reflected in the PDD.

Technology barrier:

The technology barrier stated that the process change has lead to malfunctioning of the equipment where as the CER generation for the retrospective crediting shows an elevated line from the base year and infact shown a leap in the year 2003 -04.

The assumption for the 20 days stoppage needs to be justified because in case if the activity would have taken place during the annual maintenance period. This is highly essential because the investment for the retrofitting measure is 40.47 million and the production loss considered is 93.8 million.