

Comment 1

06-03-08 8:05pm

Name: Raghu**City: Chennai****Organisation: Independent Consultant****Country: India**

1. Please demonstrate the social benefits from the project in a quantifiable manner. DOE should check the authenticity and relevance of the claims for the project activity.
2. PP should demonstrate the need for similar technology in other industries as a part of technological benefits to substantiate the claim made in the PDD.
3. In Section B.2, Criterion 4 should be demonstrated in terms of energy savings in GWhth or GWhe but not in terms of how many CERs the project reduces. Detailed calculation in the regard should be provided in the PDD.
4. Description of project boundary is not adequate.
5. The methodology AMS II.D requires direct measurement of the energy used before and after the project implementation. But the project activity involves indirect calculation to estimate the coal savings based on the reduction in the steam consumption. This raises the question of applicability of the methodology for the project. DOE should evaluate this before finalising the report. Also, there are few previous cases where in EB questioned the consideration of steam as a fuel.
6. Additionality is not convincing and adequate. Investment barrier should be demonstrated with detailed analysis of the financials mentioning suitable indicators and comparing with benchmarks to demonstrate the financial barrier. It is very well known that Grasim Fibre unit is pioneer in the field in India and perhaps in the World. No investment will be made without sound technical back up and demonstration capabilities. DOE should check the need for CDM revenue for this project considering all these aspects.
7. PP should demonstrate the usage of sub bituminous coal in the power plant all the time and DOE should check the conservativeness of the emission factor used.
8. Section B.6.2 should also contain steam pressure, temperature, enthalpy values.
9. Baseline and project emission calculations are not accurate. Power plant generates high pressure steam and this project activity may use medium or low pressure steam (not mentioned anywhere in PDD). How steam to coal ratio of power plant is directly considered for this project when the medium/low pressure steam is used in the plant. Secondly, the coal saved values are based on the Grasim data but not on the basis of parameters that are required to be monitored. How a PP/consultant used these values for a calculation? Moreover, the coal savings are based on the indirect calculations which is not to be followed as per AMS II.D.
10. Table B6.4 is not as per the format given in SSC guideline document. Example for complacency or taking things for granted?
11. Section B.7.1 is not at all adequate meeting the project and methodology requirements. Seems the PDD is developed by an entry level consultant in the field.
12. Further clarification is required on why project is applied for CDM after more than two years of its start date.

Comment 2

20-03-08 9:26am

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The project activity "Replacement of Steam based Horizontal Continuous Crystallizer by Energy Efficient Acid Absorption Crystallizer" being an energy efficiency measure must have saved cash outflows (in terms of higher steam savings) for this particular company, so how can one justify that CDM revenues are required for taking such actions.

Pls explain.

Regards,

Suparno