

**Comment 1**

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Non-applicability of methodology AM 0008

This project uses AM0008. However the methodology is not applicable. The project involves a switch from naphtha to natural gas, but in India, naphtha is more expensive than natural gas (this is even evident in the PDD-Appendix II where fuel price savings is calculated). The project proponents try to justify use of the methodology by saying that coal is cheaper than gas. However this is irrelevant (as the plant is run on naphtha, not on coal) and seems a deliberate misinterpretation of the methodology applicability conditions.