



**Training-Workshop on CDM Post-registration Changes (PRCs)  
and Programme of Activities (PoAs)  
12-14 February 2014 - Pretoria, South Africa**

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**Key - PRC Case Study 2: Temporary deviation from the registered  
monitoring plan and/or monitoring methodology**

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**Case Study 2a**

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- 1. Has the PP described the nature, extent, and duration of the non-confirming monitoring and the proposed alternative monitoring of the project activity? (PS para. 212)**

The post registration change (temporary deviation) is clearly described specifically indicating the issue that deviates from the registered monitoring plan; the detailed requirements of the monitoring plan; the precise period for which the deviation would be applied.

- 2. Has the PP applied conservative assumptions or discount factors to the calculations to the extent required to ensure that GHG emission reductions will not be over-estimated as a result of the deviation? (PS para. 214)?**

Yes. It reasonable to assume that the PP assumption will lead to conservative emission reductions as the emission reductions with this proposal will get reduced due to higher transmission loss as the Xintang substation is 10 kms further away from Qinglong sub-station from the project plant. The DOE shall validate this facts based on credible evidences and interviews, checking records during the site visit.

- 3. Is the post registration change (temporary deviation) of a nature that does not require prior approval by the Board, i.e. falling under Appendix 1 of the PS?**

No. A request for PRC approval has to be submitted by the DOE and approved by the Board before submission of the request for issuance. The temporary deviation does not fit in any of the two types described in Appendix 1 para 2 and 3: the PP did not report the parameter as zero, and the parameter is not related to project GHG emissions.

**Case Study 2b**

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- 1. Is the PP right in deciding that the post registration change (temporary deviation) does not require prior approval by the Board, i.e. falling under Appendix 1 of the PS? (Appendix 1, PS 5.0)**

Yes. The case meets the requirement of paragraph 3 of Appendix 1 to the PS 5.0. The parameter relates to project GHG emissions and the PP can estimate it assuming that the source of the GHG emission operated at maximum capacity for the full period of missing data.



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**2. How shall the PP estimate the project emission from electricity consumption? (Para 3, Appendix 1, PS 5.0). Discuss the equation to use.**

The PP shall assume that the source of the GHG emission operated at maximum capacity for the full period of missing data. Moreover, considering that project emissions relate to the consumption of electricity, the PP estimate shall include an addition of 10% to account for transmission losses. For each month of the monitoring period, the PP shall estimate the project emission (ECPJ,EG,y) as:  $ECPJ,EG,y = x * 24 \text{ hours} * 0.065 \text{ MW} * 1.1 * EF_{\text{grid}} \text{ tCO}_2/\text{MWh}$ , where x is the number of days in the given month and 0.065 MW is the maximum electricity consumption capacity of the LFG plant.

**3. What documents/evidence shall be provided to the verifying DOE to support the PP estimation/calculation of the project emission from electricity consumption?**

Most likely the DOE will request the PP the following documents to support the calculation of ECPJ,EG,y: i) excel ER calculation spreadsheet; ii) technical specification of installed equipment/machinery at the landfill site (e.g. blowers, flaring unit, etc.) to evidence the derived maximum electricity consumption capacity of 0.065MW; iii) electricity consumption bills for cross-checking purposes.

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## **Case Study 2c**

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**1. Is the post registration change (temporary deviation) of a nature that does not require prior approval by the Board, i.e. falling under Appendix 1 of the PS?**

No. A request for PRC approval has to be submitted by the DOE and approved by the Board before submission of the request for issuance. The temporary deviation does not fit in any of the two types described in Appendix 1 para 2 and 3: the parameter relates to baseline emissions and the PP did not report the parameter as zero.

**2. Has the PP applied conservative assumptions or discount factors to the calculations to the extent required to ensure that GHG emission reductions will not be over-estimated as a result of the deviation? (PS para. 214)?**

Yes. It reasonable to assume that a default value set by a later version of the applied methodology will lead to conservative emission reductions, also considering that the 60% default value is significantly lower than lowest measured value of CH<sub>4</sub> content during the monitoring period.

**3. Is the argumentation used by the PP in support of the chosen default value strong enough? What documents/evidence shall be provided to the verifying DOE to support the PP estimation?**



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1. Two measurements over a 2-year monitoring period are not strong enough to conclude that the applied default value is lower than actual values and may lead to underestimation of baseline emissions. The PP should extend the analysis to later periods and compared the default values with a broader range of measurements. It is said in the description that the PP resumed quarterly measurement of CH<sub>4</sub> content from June 2009; therefore it is reasonable to assume that other measurements are available.

Most likely the DOE will request the PP the following documents to support the application of the default values: i) CH<sub>4</sub> analysis results spreadsheet; ii) evidence of data measured (data log, etc.); iii) calibration certificate of the gas analyzers.

**End**