

# VCS PROJECT REVIEW REPORT

<b>Project ID</b>	784
<b>Project Name</b>	1.6 MW Bundled Rice Husk Based Cogeneration Plant by M/s Milk food Limited (MFL) in Patiala (Punjab) & Moradabad (U.P) Districts
<b>Project Proponent</b>	Milk Foods Limited
<b>Methodology</b>	AMS I.D.- “Grid connected renewable electricity generation “ version 16 AMS I.C. – “Thermal energy production with or without electricity” version 18
<b>Sectoral Scope(s)</b>	1. Energy (renewable/non-renewable)
<b>Validation/Verification Body (VVB)</b>	PERRY JOHNSON REGISTRAR CARBON EMISSIONS SERVICES, INC
<b>Registry</b>	APX

<b>Assessment Criteria</b>	VCS Standard, v3.5
<b>Date of First Issue</b>	11 May 2015
<b>Date of Final Issue</b>	27 May 2015

## Summary:

An accuracy review of the 1.6 MW Bundled Rice Husk Based Cogeneration Plant by M/s Milk food Limited (MFL) in Patiala (Punjab) & Moradabad (U.P) Districts issuance request has been conducted by VCS in accordance with Section 4.3 of the *Registration and Issuance Process*.

The accuracy review has raised 1 assessment finding and 1 minor finding, detailed below. The VVB, in coordination with the project proponent, is hereby required to provide a response to the assessment finding presented in section 1. The 1 assessment finding must be addressed to the satisfaction of VCS. The VVB need not to address the minor finding during this review. Please note though that where VCS finds consistent minor findings by the VVB in future reviews, minor findings shall be escalated to assessment findings.

This findings report may be made publically available, confidential information may be provided as separate attachments.

## 1 ASSESSMENT FINDINGS

### Finding 1

According to the verification report from 6 May 2009 to 31 May 2011 written by Tuv Nord there were two outstanding Forward Action Requests (FARs) to be addressed during this verification. Page 17 and page 25 of the Tuv Nord report detail these FARs.

According to the current verification report from PJR page 9, "Any remaining issues from previous validation or verification: This is the second verification (from 1st June 2011 to 13 Feb 2012) for the project against VCS version 3.3. There are no remaining issues from validation."

Given the two FARs raised in the previous verification, can the VVB confirm how these issues were addressed in the current verification report?

### VVB Response:

#### FAR 1:

**The PP has provided undertaking dated 2011-02-11 that no claim will be made for emission reductions under two GHG programs for the same monitoring period. In order to minimize the risk of double counting, the DOE will check at the time of each verification that emission reductions are not claimed or intended to claim for the same monitoring period in other GHG program (CDM) (see FAR 3.1.4-1 of FVaIR).**

**PJRCES Opinion:** The current verification period under VCS is from 01 June 2011 till 13 February 2012 (both days included).

During the verification process, PJRCES verified from the publicly available information on UNFCCC website

(<https://cdm.unfccc.int/Projects/Validation/DB/Y2JQP9EYCQUEWDFTKK1AQMJ76VXN44/view.html> )

that the project in discussion was under CDM validation process during the above said period and was registered as CDM project only on 14 February 2012. As per CDM rules, the crediting period of a CDM project activity can only start on or after the date of the registration of the project activity. In other words, any CDM project cannot claim any emission reductions prior to the date of registration of the project and same holds true for project in discussion as well.

Given the above discussion, PJRCES verified and confirmed that no emission reductions have been claimed under other GHG program (CDM) for the period 01 June 2011 till 13 February 2012.

#### FAR 2:

**1. The excel sheet with the biomass data has to be provided.**

**2. The annually monitored values for the NCVs have to be provided in the MR as well as in the excel sheet.**

**PJRCES Opinion:** During the VCS verification site visit, PJRCES verified that the client is still maintaining the biomass consumption records in excel form using the calibrated weigh bridge. The records of the same have been verified by PJRCES.

Similarly, the annually monitored values of NCV by third party have also been maintained by PP and

verified by PJRCES during the verification site visit.

The above is further supported by the fact that both the above parameters were verified by PJRCES during the 1<sup>st</sup> periodic CDM verification carried out for the period from 14 February 2012 till 31 January 2014.

Though both the FARs were verified and confirmed by PJRCES during the VCS verification process, however, PJRCES accepts that the verification team missed to address the same in the verification report submitted for issuance. The same has now been addressed and the revised verification report is submitted along with this response.

**VCS Response:**

VCS acknowledges the updates to the verification report to discuss the two FARs that were identified in the previous verification and the explanation of how these FARs were assessed by the VVB. These updates clarify how the VVB assessed that the FARs were addressed in the current monitoring period and are sufficient for VCS to close this finding.

**2 MINOR FINDINGS**

**Minor Finding 1**

On page 7 of the monitoring report Plant Load Factor has a source of data as “Third Party Determination”. The verification report does not discuss whether this is an appropriate data source for the PLF. Given the importance of Plant Load Factor in the emission reduction calculations the analysis of how this parameter was appropriate would have been useful in the verification report.

The VVB is requested to provide an assessment of each parameter stated in the monitoring report and how it was deemed appropriate when completing future verification reports.

**3 ASSESSMENT CONCLUSION**

One assessment finding was raised for this project concerning two FARs that were not discussed in the verification report. The verification report was updated to reflect these two FARs and discuss how the FARs were assessed by the VVB to be addressed in the current monitoring period. These updates to the verification report were sufficient to close the finding.