JI PROJECT VALIDATION PROTOCOL

Table 1 Mandatory Requirements for Joint Implementation (JI) Projects

REQUIREMENT	REFERENCE	CONCLUSION	Cross Reference to this protocol
1. The project shall have the approval of the Parties involved	Kyoto Protocol Article 6.1 (a)	There is no evidence of written project approvals by the Parties involved	Table 2, Section A.5
2. Emission reductions, or an enhancement of removal by sinks, shall be additional to any that would otherwise occur	Kyoto Protocol Article 6.1 (b)	OK	Table 2, Section B
3. The sponsor Party shall not acquire emission reduction units if it is not in compliance with its obligations under Articles 5 & 7	Kyoto Protocol Article 6.1 (c)	Article 5 requires "…Annex I Parties to having in place, no later than 2007, national systems for the estimation of greenhouse gas emissions by sources and removals by sinks." Article 7 requires "… Annex I Parties to submit annual greenhouse gas inventories, as well as national	-

REQUIREMENT	REFERENCE	CONCLUSION	Cross Reference to this protocol
		communications, at regular intervals, both including supplementary information to demonstrate compliance with the Protocol". Denmark has submitted its Initial Report on December 20th, 2006.	
4. The acquisition of emission reduction units shall be supplemental to domestic actions for the purpose of meeting commitments under Article 3	Kyoto Protocol Article 6.1 (d)	OK	-
5. Parties participating in JI shall designate national focal points for approving JI projects and have in place national guidelines and procedures for the approval of JI projects	Marrakech Accords, JI Modalities, §20 \	Both countries have designated their Focal Points. National guidelines and procedures for approving JI projects have been published. Contact data in Bulgaria: **Ministry of Environment and Water** 67, W. Gladstone Str. 1000 Sofia Phone: +359 2 940 61 01 Fax: +359 2 981 66 10 Email: ji_grozeva@moew.government.bg milya@moew.government.bg National guidelines and procedures for the approval of JI projects are available <	-

REQUIREMENT	REFERENCE	CONCLUSION	Cross Reference to this protocol
		http://www.moew.government.bg/recent_doc/international/climate/Guidelines_eng.pdf > Contact data in Denmark: **Danish Ministry of the Environment** **Environmental Protection Agency** Strandgade 29 DK-1401 Copenhagen K Phone:+45 32 66 02 26, +45 32 66 01 00 Fax:+45 32 66 04 79 Email: jaf@mst.dk National guidelines and procedures for the approval of JI projects are available <http://www.danishcarbon.dk/News/170707_strategy.htm>	
6. The host Party shall be a Party to the Kyoto Protocol	Marrakech Accords, JI Modalities, §21(a)/24	Bulgaria is an Annex I Party to the Kyoto Protocol and has ratified the Kyoto Protocol on August 15th, 2002.	
7. The host Party's assigned amount shall have been calculated and recorded in accordance with the modalities for the accounting of assigned amounts	Marrakech Accords, JI Modalities, §21(b)/24	In the Initial Report (refXX) submitted by Bulgaria on July 25th, 2007 the AAUs are quantified in: 132 676 003.0 x 0.92 x 5 = 610 309 614 Mg CO_2 equivalent	

REQUIREMENT	REFERENCE	CONCLUSION	Cross Reference to this protocol
8. The host Party shall have in place a national registry in accordance with Article 7, paragraph 4	Marrakech Accords, JI Modalities, §21(d)/24	The designed system of the national registry has been described in the Initial Report mentioned above	-
9. Project participants shall submit to the independent entity a project design document that contains all information needed for the determination	Marrakech Accords, JI Modalities, §31	OK	-
10. The project design document shall be made publicly available and Parties, stakeholders and UNFCCC accredited observers shall be invited to, within 30 days, provide comments	Marrakech Accords, JI Modalities, §32	The PDD has been made public available via UNFCCC website from December 15th, 2006 to January 13th 2007.	-
11. Documentation on the analysis of the environmental impacts of the project, including transboundary impacts, in accordance with procedures as determined by the host Party shall be submitted, and, if those impacts are considered significant by the project participants or the Host Party, an environmental impact assessment in accordance with procedures as required by the Host Party shall be carried out	Marrakech Accords, JI Modalities, §33(d)	OK	Table 2, Section F
12. The baseline for a JI project shall be the scenario that reasonably represents the GHG emissions or removal by sources that would occur in absence of the proposed project	Marrakech Accords, JI Modalities, Appendix B	OK	Table 2, Section B
13. A baseline shall be established on a project-specific basis, in a transparent manner and taking into account relevant national and/or sectoral policies and circumstances	Marrakech Accords, JI Modalities, Appendix B	OK	Table 2, Section B
14. The baseline methodology shall exclude to earn CERs for decreases in activity levels outside the project or due to force	Marrakech Accords,	OK	Table 2, Section B

REQUIREMENT	REFERENCE	CONCLUSION	Cross Reference to this protocol
majeure	JI Modalities, Appendix B		
15. The project shall have an appropriate monitoring plan	Marrakech Accords, JI Modalities, §33(c)	OK	Table 2, Section D

Table 2 Requirements Checklist

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
A. General Description of the small-scale project					

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
A.1 Title of the small-scale project					
A.1.1. Is the title of the project presented?		DR	Small Hydropower station SHPS "Potochnitsa"	OK	OK
A.1.2. Is the current version number of the document presented?		DR	Version 1.0	OK	OK
A.1.3. Is the date when the document was completed presented?		DR	Date 01/11/2006	OK	OK
A.2. Description of the small-scale project					
A.2.1. Is the purpose of the project included?		DR	The project consists of a run-of-river small hydro power station (9.38 MW). Its objective is to help Bulgaria to meet rising demand for energy due to economic growth and to improve the supply of electricity.	OK	OK
A.2.2. Is it explained how the proposed project reduces greenhouse gas emissions?		DR	Reduce pollution with noxious gases and dust (SO2, NOx, TSP), including greenhouse gases resulting from combustion of coal for power generation through their replacement by electricity supply from renewable energy sources;	OK	OK
A.2.3. Is the view of the project participants on the contribution of the project to sustainable development included?		DR	It is stated in the PDD that the project will help to achieve economic and environmental benefits to the Haskovo District and will contribute to the local sustainable development of the region as a Renewable Energy Source (RES). Several specific arguments are listed in the PDD.	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
A.3. Project participants					
A.3.1. Are Party(ies) and private and/or public entities involved in the project listed?		DR	Republic of Bulgaria Host Party - FINAUTO LTD. Kingdom of Denmark – Danish Carbon Please, clarify if France is really a Party involved or lonely the supplier of the equipment	CL 1	OK
A.3.2. The data of the project participants are presented in tabular format?		DR	See Table No.1 of the PDD	OK	OK
A.3.3. Is contact information provided in annex 1 of the PDD?		DR	There are no evidences of contact information of Danish Carbon in Annex 1 of the PDD	CAR1	OK
A.4. Technical description of the small-scale project					
A.4.1. Location of the small scale project					
A.4.1.1. Host Party(ies)		DR	Republic of Bulgaria	OK	OK
A.4.1.2. Region/State/Province etc.		DR	Haskovo District	OK	OK
A.4.1.3. City/Town/Community etc.		DR	Village of Dolno Cherkovishte, Stambolovo Municipality	OK	OK
A.4.1.4. Detail of the physical location, including information allowing the unique identification of the small-scale project		DR	SHPS “Potochnitsa” will be located 3.5km away downstream of Stouden Kladenets HPS along the course of the river of Arda and 1 km downstream of the mouth of r. Krumovitsa. The Project will be implemented on a site on the territory of the village of Dolno Cherkovishte and is	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			situated 350m away from the bridge across the river of the road Krumovgrad - Tunkovo. The coordinates of the prospective small-scale Project site are: ▪ Longitude 230 39' 53.05"E; ▪ Latitude 410 36' 45.93"N.		
A.4.2. Small-scale project type(s) and category(ies)					
A.4.2.1. Is the type and category of the project specified?		DR	According to the provisions for small-scale projects, as defined in paragraph 6(c) of decision 17/CP.7, and paragraph 2(f) of decision 10/CMP.1 the Project type and category are as follows: Type I: Renewable energy project with maximum output capacity of 9,38MW. Category I.D: Power generation for electric power system by renewable energy source. Subcategory: Hydropower.	OK	OK
A.4.2.2. Is it justified how the proposed project conforms to the project type and category selected?		DR	The total installed capacity of SHPS "Potochnitsa" is 9,38MW which is less than the restrictive capacity 15MW of small-scale JI projects. The power is generated by water which is a renewable energy source and the production is free of greenhouse gases. The generated electric power will be delivered to the transmission network of the country.	OK	OK
A.4.2.3. Is it described that the project is eligible as small-scale category?		DR	The total installed capacity of SHPS "Potochnitsa" is 9,38MW which is less than the restrictive capacity 15MW of small-scale	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			JI projects.		
A.4.2.4. Is it described that the project will remain under the limits for small-scale project types every year over the credit period?		DR	Please, clarify if there is any possibility of the project exceeds the limits for small-scale project types every year over the crediting period.	CL2	OK
A.4.3. Technology(ies) to be employed, or measures, operations or actions to be implemented by the small-scale project					
A.4.3.1. Does the project design engineering reflect current good practices?		DR	Please, clarify if the project design engineering reflects current good practices.	CL3	OK
A.4.3.2. Does the project use state of the art technology or would the technology result in a significantly better performance than any commonly used technologies in the host country?		DR	Pleas, clarify if the project uses state of the art technology or the technology would result in a significantly better performance than any commonly used technologies in the host country.	CL4	OK
A.4.3.3. Is the project technology likely to be substituted by other or more efficient technologies within the project period?		DR	Please, clarify if the project technology is likely to be substituted by other or more efficient technologies within the project period.	CL5	OK
A.4.3.4. Does the project require extensive initial training and maintenance efforts in order to work as presumed during the project period?		DR	Please, clarify if the project requires extensive initial training and maintenance efforts in order to work as presumed during the project period.	CL6	OK
A.4.3.5. Does the project make provisions for meeting training and maintenance needs?		DR	Please clarify if the project makes provisions for meeting training and maintenance needs.	CL7	OK
A.4.4. Brief explanation of how the anthropogenic emissions of greenhouse gases by sources are to					

	CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
	be reduced by the proposed small-scale project, including why the emission reduction would not occur in the absence of the proposed small-scale project, taking into account national and/or sectoral policies and circumstances					
A.4.4.1.	Is it stated how anthropogenic GHG emission reductions are to be achieved?		DR	There will be reduction in the emission of greenhouse gases throughout the project because of the displacement of generation of electricity from fossil-fuel thermal plants that would have otherwise delivered to the interconnected grid.	OK	OK
A.4.4.2.	Is it provided the estimation of emission reductions over the crediting period?		DR	85'030 in tCO_2e	OK	OK
A.4.4.3.	Is it provided the estimated annual reduction for the chosen credit period in tCO_2e?		DR	23'522	OK	OK
A.4.4.4.	Are the data from questions A.4.3.2 to A.4.3.4 above presented in tabular format?		DR	Yes.	OK	OK
A.4.5.	Confirmation that the small-scale project is not a debundled component of a larger project					
A.4.5.1.	Is there any approved or any application for approval of a small-scale project with the same project participants?		DR	No	OK	OK
A.4.5.2.	Is there any approved or any application for approval of a small-scale project in the same project category and technology/measure?		DR	No	OK	OK
A.4.5.3.	Is there any approved or any application for approval of a small-scale project registered within the previous 2 years?		DR	No	OK	OK
A.4.5.4.	Is there any approved or any application for approval of a small-scale project whose project boundary is		DR	No	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
within 1km of the project boundary of the proposed small-scale activity at the closest point?					
A.5. Project approval by the Parties involved					
A.5.1. Is the project approved by the Parties involved?		DR	There are no evidences of approval from Parties involved.	CAR2	OK
B. Baseline					
B.1. Description and justification of the baseline chosen					
B.1.1. Is it justified the choice of the applicable baseline for the project category?		DR	The grounds for applicability of the AMS-I.D. methodology to this small-scale JI project are as follows: • The Project is of a hydropower type, one of the several renewable energy sources project types where the use of that methodology is allowed; • The total installed capacity of Small Hydropower Station "Potochnitsa" is 8,7MW which is within the permissible limits 15MW of the chosen methodology for small-scale projects; • The methodology is applicable to renewable energy sources projects that will deliver electric power to the country's power transmission network. Please, refer to the latest version (10) of AMS-I.D	CL8	OK
B.1.2. Are the basic assumptions of the baseline methodology in the context of the project presented?		DR	The baseline scenario is the continuation of the current situation of electricity supplied by large thermal power stations.	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
B.1.3. Is all literature and sources clearly referenced?		DR	There are no evidences of references of literature and sources mentioned in the PDD	CAR3	
B.2. Description of how the anthropogenic emissions of greenhouse gases by sources are reduced below those that would have occurred in the absence of the registered small-scale project					
B.2.1. Is the proposed project additional?		DR	There is no evidence of an investment analysis of the project, taking into account factors such as internal rate of return with and without CERs, price of electricity sold to the grid, etc.	CAR4	OK
B.2.2. Is it demonstrated that the project itself is not a likely baseline scenario?		DR	The Project implementation costs are considerably higher than those for construction of conventional power units fired with fossil fuels. Due to the lack of experience in crediting of renewable energy sources, the local banks do not consider such projects attractive and refuse to credit them. The Bulgarian commercial banks avoid offering long-term credit for such small energy projects since they consider them highly risky. The project is considered a project hard to implement from technical point of view due to the need for construction of an overflow dam consisting of ten overflow bays shutting by means of radial gates.	OK	OK
B.2.3. Are national policies and circumstances relevant		DR	The prevailing practice in Bulgaria in the	CL9	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
to the baseline of the proposed project summarized?			energy sector is described, but not really the national policies and circumstances relevant to the baseline. Please, clarify		
B.3. Description of how the definition of the project boundary is applied to the small-scale project					
B.3.1. Are the project's spatial (geographical) boundaries clearly defined?		DR	There are no evidences of clear definitions of the project boundary.	CAR5	OK
B.4. Further baseline information, including the date of baseline setting and the name(s) of the person(s)/entity(ies) setting the baseline					
B.4.1. Is the baseline for the proposed project specified?		DR	The baseline for the proposed project is not clearly specified. Please, clarify.	CL10	OK
B.4.2. Is the date of completing presented in DD/MM/YYYY?		DR	30/10/2006	OK	OK
B.4.3. Is the contact information provided?		DR	Mr. Christo Schwabski	OK	OK
B.4.4. Is the person/entity also a project participant listed in Annex 1 of PDD?		DR	Mr. Christo Schwabski and National Electric Company EAD are not project participants and are not listed in Annex 1 of the PDD.	CAR6	OK
C. Duration of the small-scale project and crediting period					
C.1. Starting date of the small-scale project					
C.1.1. Is the project's starting date clearly defined?		DR	The date on real action of the project is not properly defined. Please, clarify.	CL11	OK
C.2. Expected operational lifetime of the small-scale project					
C.2.1. Is the project's operational lifetime clearly defined in years and months?		DR	The operational lifetime of the project is defined in years but not months	CAR7	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
C.3. Length of the crediting period					
C.3.1. Is the length of the crediting period specified in years and months?		DR	The length of the crediting period is defined in years but not months	CAR8	OK
D. Monitoring Plan					
D.1. Description of monitoring plan chosen					
D.1.1. Is the monitoring plan defined?		DR	Approved CDM Monitoring methodology for small-scale projects AMS-I.D, 28 July 2006: Grid connected renewable electricity generation" may be used in this Project.	OK	OK
D.2. Data to be monitored					
D.2.1. Is it provided, for each parameter, the source(s) of data that will be actually uses for the proposed project?		DR	Table No. 6 of the PDD	OK	OK
D.2.2. Is it provided for each parameter, the measurement methods and procedures, measurement equipment, calibration procedures applied, and accuracy of the measurement methods		DR	There are no evidences of definition of measurement methods and procedures, measurement equipment, calibration procedures applied, and accuracy of the measurement methods.	CAR9	OK
D.3. Qualitative control (QC) and quality assurance (QA) procedures undertaken for data monitored					
D.3.1. Are there quality control and quality assurance procedures to be used in the monitoring of the measured data established?		DR	Table from item D.3. of the PDD.	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
D.4. Brief description of the operational and management structure that will be applied in implementing the monitoring plan					
D.4.1. Is it described briefly the operational and management structure that the project participants(s) will implement in order to monitor emission reduction and any leakage effects generated by the project		DR	The firm FINAUTO is planning to set up a JI Project Team who will be in charge of the Monitoring. The Team staff will allocate among themselves the assignments for collection, compiling, and calculation of the required data under the monitoring plan. Once a month, the Team will review and check the projects of the previous month, will verify the collected data and the respective estimated Project emission reductions. The monitoring reports will be prepared in conformity with the approved procedures of the JI Project, and will be acceptable for auditing by a third party in manner and structure.	OK	OK
D.5. Name of person/entity determining the monitoring methodology					
D.5.1. Is the contact information provided?		DR	Mr. Christo Schwabski	OK	OK
D.5.2. Is the person/entity also a project participant listed in Annex 1 of PDD?		DR	Refer to B.4.4.	-	-
E. Estimation of greenhouse gases emission reductions					
E.1. Estimated project emissions and formulae used in the estimation					

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
E.1.1. Are described the formulae used to estimate anthropogenic emissions by source of GHGs due the project?		DR	There are no anthropogenic emission formulae applicable to the Project within its boundaries.	OK	OK
E.1.2. Is there a description of calculation of GHG project emissions in accordance with the formula specified in for the applicable project category?		DR	Not applicable	OK	OK
E.1.3. Have conservative assumptions been used to calculate project GHG emissions?		DR	Not applicable	OK	OK
E.2. Estimated leakage and formulae used in the estimation, if applicable					
E.2.1. Are described the formulae used to estimate leakage due to the project where required?		DR	There is no leakage that can be considered as resulting from the Project.	OK	OK
E.2.2. Is there a description of calculation of leakage in accordance with the formula specified in for the applicable project category?		DR	Not applicable	OK	OK
E.2.3. Have conservative assumptions been used to calculate leakage?		DR	Not applicable	OK	OK
E.3. Sum of E.1 and E.2.					
E.3.1. Does the sum of E.1. and E.2. represent the small-scale project emissions?		DR	The sum of emissions due to project and leakage is zero.	OK	OK
E.4. Estimated baseline emissions and formulae used in the estimation					
E.4.1. Are described the formulae used to estimate the anthropogenic emissions by source of GHGs in the baseline using the baseline methodology for the applicable project category?		DR	$BEm_y = EG_y * EF_{grid}$ [tCO_2e]	OK	OK
E.4.2. Is there a description of calculation of GHG baseline emissions in accordance with the formula		DR	There are no evidences of description of calculation of baseline emissions	CAR10	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
specified in for the applicable project category?					
E.4.3. Have conservative assumptions been used to calculate baseline GHG emissions?		DR	Please, clarify if the assumptions used to calculate baseline emissions are conservative.	CL12	OK
E.5. Difference between E.4. and E.3. representing the emission reductions of the project					
E.5.1. Does the difference between E.4. and E.3. represent the emission reductions due to the project during a given period?		DR	Since project emission is nil, total emission reductions equal to baseline emissions	OK	OK
E.6. Table providing values obtained when applying formulae above					
E.6.1. Is there a table providing values of total CO_2 abated?		DR	Table with estimated emissions reductions is presented in E.6.	OK	OK
F. Environmental Impacts					
F.1. Documentation on the analysis of the environmental impacts of the project, including transboundary impacts, in accordance with procedures as determined by the host Party					
F.1.1. Has an analysis of the environmental impacts of the project been sufficiently described?		DR	YES	OK	OK
F.1.2. Are there any Host Party requirements for an Environmental Impact Assessment (EIA), and if yes, is and EIA approved?		DR	With Decision No.XA-46-ПР/2005, the Regional Inspectorate of Environment and Water - Haskovo finds that it is not necessary to perform any Project EIA. It means that the environmental assessment of the Project contained in the written documentation is sufficient to assess	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			the environmental impact during the construction of SHPS Potochnitsa and during Project operation. At the same time, that Decision permits implementation of the Project as a completely lawful from environmental protection point of view.		
F.1.3. Are the requirements of the National Focal Point being met?		DR	YES	OK	OK
F.1.4. Will the project create any adverse environmental effects?		DR	**>>** The comments, remarks and additional requirements towards the Project from the environmental protection point of view in the process of its implementation and operation are summarized below: 1. The Project will produce electric power using a RES – the energy potential of the river which is an activity preferential in Bulgaria since the latter joined the Kyoto Protocol that was approved by an Act of Parliament of 16.05.2005, thereby becoming mandatory. 2. Only areas within the river bed are affected by ponding after construction of the dam. 3. Implementation of the proposal will not necessitate any change in the existing road infrastructure or construction of a new one. 4. The new SHPS will be fully automated. 5. During Project operation, there will be no	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			sources of adverse physical factors: noise, vibrations and harmful radiation. 6. The solid run-off-river drift and bottom silt – will be transported mainly while high waves are passing. The integrated works facilities designed for letting through the flood water will also ensure transportation of the solid run-off in conditions of conformity with the transportation mode of the natural river stream. 7. Operation of SHPS Potochnitsa does not involve any risk of water pollution, and the water downstream of the turbines will have higher oxygen content. 8. The Project does not affect any territories or habitats protected by law, existing monuments of culture and territories of specific sanitary status. 9. The detailed design shall include construction and maintenance of a fish passage that will prevent interruption of fish migration and movement. 10. The Project does not create any risk of significant water pollution provided that the equipment operation requirements are met and pollution by oils or lubricants is not allowed. 11. Refueling and lubricant replacement shall be done outside the boundaries of the hydropower facility. 12. A contract shall be concluded with a		

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			company holding a permit or registration under Art.12 of the Waste Management Act (WMA) published in State Gazette No. 86/30.09.2003r. for delivery of waste generated in the process of construction. 13. Wastes generated during construction and operation shall be collected and transferred to an operating registered waste disposal site. 14. Construction waste shall be treated in conformity with Art.18 of the WMA. 15. Municipal waste shall be treated in conformity with Art.16, paragraph 1 and paragraph 2 of the WMA. 16. Hazardous waste shall be treated in conformity with the WMA and the related secondary legislation. 17. An Emergency Action Plan shall be elaborated. 18. Before implementation of the investment proposal, a procedure for obtaining water use permit shall be carried out in accordance with the provisions of Chapter IV of the Water Act published in State Gazette No. 67 / 1999. 19. The Project does not involve any risk to health or environment. 20. No written or verbal objections against the Project have been received at the mayors' offices in the Krumovgrad and Stambolovo municipalities.		

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			>> **Report on item 9 of the Comments:** The construction part of the detailed design of SHPS Potochnitsa includes construction of a fish passage going round the power station. In order to let through the fish migrating to the river of Krumovitsa during the reproduction period, a fish passage version was selected in the form of a free channel with dimensions: width W = 2m; length L = 1200m; river floor elevation in the beginning of the fish passage – 147,50, rift in the gully; outfall elevation - 142,00 downstream of the bridge and rise H = 5,00m. The floor and walls of the channel will be partly in the natural ground and partly concreted. In order to provide near to nature conditions for the migrating fish, it is planned to cover the concreted sectors of the walls and floor with material taken from the river. The envisaged slope of the channel (5m at about 900m), will ensure flow velocity about 1,0 ÷ 1,3m/sec, which migrating fish can overcome without problems. In order to regulate the flow rate of water released through the fish passage		

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			channel, an automatic outlet will be made in the weir, and then the quantity of water required for fish migration will be let through, while maintaining a permanent top water level irrespective of the influx. For overall protection of the facility, construction of a fence and permanent security monitoring by devices at Potochnitsa HPS and at the fish passage are envisaged. **Report on item 12 of the Comments:** A contract will be concluded with the holder of a permit under Art.12 of the Waste Management Act for transfer of the waste generated during construction after a contract has been concluded with the contractor of the site construction works. **Report on item 13 of the Comments:** The waste generated during construction and operation will be collected and transported to the operating dump site indicated by the mayor's office of Stambolovo municipality. **Report on item 15 of the Comments:** The municipal waste will be treated in conformity with Art.16 Paragraph 1 of WMA with the existing waste management organization on the territory of Stambolovo		

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			municipality. **Report on item 17 of the Comments:** Together with the detailed design of SHPS Potochnitsa, an Emergency Action Plan was drawn up taking into account the possibility of natural disasters including floods, earthquake, etc. **Report on item 18 of the Comments:** The procedure of obtaining a water use permit in compliance with the Water Act was carried out. Water Use Permit No. 301074 / 21.10.2005r. was received from the MoEW Basin Directorate of the East Aegean Region with central office in the city of Plovdiv.		
F.1.5. Are transboundary environmental considered in the analysis?		DR	NO	OK	OK
F.1.6. Have identified environmental impacts been addressed in the project design?		DR	YES	OK	OK
***G.* Stakeholders' comments**					
G.1. Information on stakeholders' comments on the project, as appropriate					
G.1.1. Have relevant stakeholders been consulted?		DR	YES	OK	OK
G.1.2. If a stakeholder consultation process is required by regulations/laws in the host country, has the		DR	YES	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
stakeholder consultation process been carried out in accordance with such regulations/laws?					
G.1.3. Is it described the process by which comments by local stakeholders have been invited and compiled?		DR	Notification of local stakeholders and feedback of their opinions and recommendations for the Project were carried out in conformity with the legislation regulating environmental protection. The procedures of notification and assessment of the need for EIA are described in Chapter Two of the Regulation on the Conditions and Procedure of EIA of Investment Proposals for Construction, Activities and Technologies adopted by Council of Ministers Ordinance No.59 / 07.03.2003. In accordance with these procedures, by its letter of January 2005 FINAUTO informed RIEW – Haskovo on whose territory SHPS Potochnitsa will be located, of its project investment proposal. Simultaneously with notification of the competent authority, the Project proponent informed, by letter Incoming Ref. No.53-00-81, dated 18.03.2005. to the mayors of the municipalities concerned – Stambolovo and Krumovgrad, and to the mayors' offices in the villages of Dolno Cherkovishte, Rabovo (within Stambolovo Municipality) and Oreshari, Moryantsi and Potochnitsa (within Krumovgrad Municipality) of FINAUTO's investment intent to build the run-of-the-river	OK	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			SHPS Potochnitsa. In that letter, in accordance with the EPA and the abovementioned Regulation, written positions were requested from the municipalities and villages concerned with the Project implementation. With its Letter Ref. No. 73/13.03.2005 to the Director of RIEW – Haskovo, the Project proponent presented the Information Required for Estimation of the Need for Project EIA. On the grounds of Art.4 Paragraph 2 of the Regulation, FINAUTO informed the residents of Stambolovo and Krumovgrad Municipalities of its intention to implement the Project by an announcement in the local newspapers „NOVINAR YUG" and „New Life" published in the towns of Kirdzhali and Haskovo and distributed all over Haskovo District. All positions, opinions and recommendations concerning the Project were sent to the competent authority, in this case – RIEW - Haskovo, to be taken into account in the Decision on the need for EIA and, in that manner, the prerequisites were established for either obtaining a permit for further development of the Project or its rejection due to inadequate environmental conformity.		

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
G.1.4. Are the stakeholders that have made comments identified?		DR	YES	OK	OK
G.1.5. Is a summary of the stakeholder comments received provided?		DR	YES	OK	OK
G.1.6. Has due account been taken of any stakeholder comments received?		DR	YES	OK	OK

Table 3 Approved Consolidated Baseline and Monitoring Methodologies for selected small-scale CDM project activity categories AMS ID

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
1. **Technology/measure**					
1.1. Does the project comprise renewable energy generation units, such as photovoltaics, hydro, tidal/wave, wind, geothermal, and renewable biomass, that supply electricity to and/or displace electricity from an electricity distribution system that is or would have been supplied by at least one fossil fuel fired generating unit.?		DR	The power is generated by water which is a renewable energy source and the production is free of greenhouse gases. The generated electric power will be delivered to the transmission network of the country.	OK	OK
2. **Boundary**					
2.1. Does the project boundary encompass the physical, geographical site of the renewable generation source?		DR	Refer to B.3.1.	-	-
3. **Baseline**					
3.1. Did the project participants identify the most plausible baseline scenario among all realistic and credible alternatives(s)?		DR	Please clarify why the emission factor is calculated as the weighted average between the emission factor of the Simple Operation Margin and the Build Margin emission factor, and no other option for this calculation was chosen	CL13	OK
3.2. Was electricity production calculated considering the formula presented at item 10 of the methodology?		DR	Please, clarify why electricity production was not calculated considering the formula presented at item 10 of the methodology?	CL14	OK
4. **Monitoring**					
4.1. Does the monitoring consist of metering the electricity generated?		DR	The monitoring will consist in continuous measurement of the net electric power generated by Potochnitsa SHPS.	OK	OK

Table 4 Legal requirements

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
1. **Legal requirements**					
1.1. Is the project environmentally licensed by the competent authority?		DR	YES	OK	OK
1.2. Are there conditions of the environmental permit? In case of yes, are they already being met?		DR	NO	OK	OK
1.3. Are the conditions of Water Use Permit 301074/24.10.2005 being met?		DR	YES	OK	OK
1.4. Are the conditions of Art. 93, Paragraph 5 of the Environmental Protection Act being met?		DR	YES	OK	OK
1.5. Are the conditions of Decision ΧΑ-46-ΠΡ/2005 being met?		DR	YES	OK	OK
1.6. Is the project in line with relevant legislation and plans in the host country?		DR	YES	OK	OK

Table 5 Resolution of Corrective Action and Clarification Requests

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
CAR1: There are no evidences of contact information of Danish Carbon in Annex 1 of the PDD.	Table 2: A.3.3	Contact information on ERU's buyer Danish Carbon is enclosed on Annex 1 of PDD	PDD version 5.0 was checked, this information was inserted in Annex 1, and this CAR is closed.
CAR2: There are no evidences of approval from Parties involved.	Table 2: A.5.1	1. FINAUTO submits PIN and all required supplemental legal documents to Bulgarian MoEW for Expression of Interest to generate Emission Reductions Units of SHPS "Potochnitsa". MoEW's endorsement was issued for developing SHPP Potochnitsa as JI project. Please see MoEW's Letter of Support which is enclosed on PDD as Annex 4. 2. Danish Carbon (DC) signed with FINAUTO a Letter of Intent to buy ERU's generated by JI project SHHP "Potochnitsa". Evidence of project approval as JI could be received from DC via email. Contact information about DC is enclosed on Annex 1 of PDD. MECAMIDI signed with FINAUTO an Engineering, Procurement and Construction (EPC) Agreement for SHPP "Potochnitsa" project. Evidence could be received via email	This CAR will be closed after the issuance of the LoA by the MoEW's, Danish NFP.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		from this firm. Contact information about MECAMIDI is enclosed on Annex 1 of PDD.	
CAR3: There are no evidences of references of literature and sources mentioned in the PDD.	Table 2: B.1.3	Please find enclosed footnotes on items A.2.1, A.2.2, A.2.3, A.4.2, 9, 10, 11, 12, 13, 17, 18 and 19 of PDD, where references of literature and information sources are mention.	PDD version 5.0 was checked, these references were inserted, and this CAR is closed.
CAR4: There is no evidence of an investment analysis of the project, taking into account factors such as internal rate of return with and without CERs, price of electricity sold to the grid, etc.	Table 2: B.2.1	Project financial Analysis is enclosed as Annex 3 of PDD. The financial analysis is elaborated on Excel file: < FinCalc JI Project SHPS Potochnitsa 27Sep2007.xls > Revised financial analysis is enclosed as Annex 3 of PDD. The revised analysis is elaborated on Excel file: < FinCalc JI Project SHPS Potochnitsa 27Sep2007_rev.xls >	Information checked by local financial specialist, which has reviewed the data for the correctness of the basic accounting and economic issues in the assumption sheet. There is a mistake in the corporate tax for 2007, which is considered 15% instead of 10%, which is the actual value. The revised financial analysis was evaluated. The assumed data has a solid background for the calculations made. Besides that, the tool for addinionality was not properly applied. Outputs of step 1 are not in accordance with the tool

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		Revised PDD was modified with insertions on the outputs of step 1 of additionality tool and elaboration on step 4.	and step 4 is missing. PDD version 6.0 was checked, these insertions were evaluated by the determination team and this CAR is closed.
CAR5: There are no evidences of clear definitions of the project boundary.	Table 2: B.3.1	Please find enclosed definition and evidences of project boundaries on item B.3 PDD	PDD version 5.0 was checked, these definitions were inserted in item B.3, and this CAR is closed.
CAR6: Mr. Christo Schwabski and National Electric Company EAD are not project participants and are not listed in Annex 1 of the PDD.	Table 2: B.4.4	1. Mr. Christo Schwabski is assigned of FINAUTO to elaborate the PDD and other supported documents for JI project SHPS Potochnitsa, as private consultant. 2. National Electric Company has no participation in this JI project. Please see corrections made on items B.4. and D.%. of PDD.	PDD version 5.0 was checked, this information was inserted in item B.3, and this CAR is closed.
CAR7: The operational lifetime of the project is defined in years but not months.	Table 2: C.2.1	Correction is made in PDD. Please see on item C.2. of PDD. Operational lifetime of the project is defined to 50 years (600 months).	PDD version 5.0 was checked, this information was inserted in item C.2, and this CAR is closed.
CAR8: The length of the crediting period is defined in years but not months.	Table 2: C.3.1	Corrections are made in PDD. Please see the new wording on item C.3. of PDD. Length of the crediting period is defined to 3 years and 6 months or totally 42 months.	PDD version 5.0 was checked, this information was inserted in item C.3, and this CAR is closed.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
CAR9: There are no evidences of definition of measurement methods and procedures, measurement equipment, calibration procedures applied, and accuracy of the measurement methods.	Table 2: D.2.2	Measurements methods, their accuracy and procedures, the type of electric meters and applied calibration procedures are according to "Bulgarian Electricity Metering Rules" (BEMR) published by State Energy and Water Regulatory Commission (SEWRC). Please see the wording in new items 3,4 and 5 on item D.3. of PDD.	PDD version 5.0 was checked, this definition was inserted in item D.3, and this CAR is closed.
CAR10: There are no evidences of description of calculation of baseline emissions.	Table 2: E.4.2	The detailed baseline calculations are attached to PDD as Excel file < SHPS Potochnitsa Baseline Calculations 29Nov2007.xls >	Please, summarize it and insert it in the PDD. O.K. Text and tables are inserted on Annex 2 of PDD versio 6.0.
CL1: Please, clarify if France is really a Party involved or lonely the supplier of the equipment.	Table 2: A.3.1	1. France as a state is not involved in this JI Project. 2. EPC Contractor of SHPS Potochnitsa is the French company MECAMIDI which head office is locates in city of Toulouse, France.	PDD version 5.0 was checked, this information was evaluated, and this CL is closed.
CL2: Please, clarify if there is any possibility of the project exceeds the limits for small-scale project types every year over the crediting period.	Table 2: A.4.2.4	1. The design developed discharge is 170m^3/s and was confirmed by Water Use Permit No. 301074/27.06.2007, issued by the Basin Directorate, within Bulgarian Ministry of Environment and Water (MoEW). On the basis of that Permit the total installed capacity of SHPS „Potochnitsa" – 9,38 MW, was	The information in the Water Use Permit was checked by the local verifier and found correct.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		determined. 2. There are no any possibilities to increase the power generation of HPP "Potochnitsa" even if bigger hydro-turbines exceeding the limits for small-scale project are installed during crediting period due to limited water resources of river Arda. This is confirmed with water economy analysis. Please see item A.2 of PDD.	PDD version 5.0 was checked, this clarification was inserted in item A.2, and this CL is closed.
CL3: Please, clarify if the project design engineering reflects current good practices.	Table 2: A.4.3.1	Since the beginning of there activities MECAMIDI has been turbine manufacture. Nowadays the French company has been developing more extensively entire hydroelectric power stations from 200kW up to 100MW. By this means MECAMIDI has become one of global leaders in this range of hydropower facilities with more than 500 HPS installed around the world. Please see the company web site for more reference: < http://www.mecamidi.com/ >	Please insert this information in the PDD. O.K. Text inserted on item A.4.3.3 of PDD version 6.0.
CL4: Please, clarify if the project uses state of the art technology or the technology would result in a significantly better performance than any commonly used technologies in the host country.	Table 2: A.4.3.2	1. Kaplan type turbines are not manufacture in the host country. Thus, they are few examples in the country for application of this technology and all of these HPS are situated after dam reservoirs. These HPS are fitted with Kaplan turbines from abroad and all	Please insert this information in the PDD. O.K. Text inserted on item A.4.3.3 of PDD version 6.0.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		are imported from the former Soviet Union and the former Czechoslovakia. 2. The Kaplan turbines of MECAMIDI are in compliance with all international standards of International Elecrtrotechnique Commission (IEC) concerning manufacture, testing and control systems equipment of Caplan turbines. 3. The list of applicable IEC standards are submitted with the PDD and are shown on file < Standard reference hydro-turbines MECAMIDI.pdf >	
CL5: Please, clarify if the project technology is likely to be substituted by other or more efficient technologies within the project period.	Table 2: A.4.3.3	1. The project technology utilize Kaplan type water turbine. There are no other suitable hydropower turbines for run-of-the-river low falls except this type of turbine. 2. Pelton and Francis type water turbines are the other well develop hydro turbines, but they are not applicable for this project, because of the required water falls for there application which is higher than 10 meters. 3. The Kaplan turbines are fitted for low falls, from 1.30 m to 30 m of fall height. The entry of water could be regulated by mobile blades of the distributor placed upstream of the wheel of the turbine, and by the pales which angle is modified by a mechanism inside the shaft.	Please insert this information in the PDD. O.K. Text inserted on item A.4.3.3 of PDD version 6.0.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		4. Therefore Kaplan turbines are the only one type of hydro-turbine suitable for this project and could not be substituted by other new technology based on primary hydro energy sources within the project period.	
CL6: Please, clarify if the project requires extensive initial training and maintenance efforts in order to work as presumed during the project period.	Table 2: A.4.3.4	1. The duration of the guarantee period is 24 months for parts and labour as from the date of the provisional equipment acceptance. 2. If, during the guarantee period, the equipment or parts of the equipment are found to be defective, or continuously demonstrates failures that can be attributed to defective design or workmanship, or does not meet the contractual specifications, EPC contractor shall, following a written notification from the Purchaser , remedy the defects, or failures within a reasonable time. 3. After the end of the guarantee period, the Supplier undertakes to make available to the Purchaser, at the latter's request and expenses, After Sales Service (ASS), comprising the supply of spare parts and repairs of whatever nature, relative to the equipment supplied for a minimum period of 10 years. 4. The EPC contractor will inform the Purchaser annually of any technological innovations concerning the equipment it has	Please insert this information in the PDD. O.K. Text inserted on item D.4 of PDD version 6.0.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		purchased. 5. The EPC contractor will arrange initial comprehensive training of necessary operation and current maintenance staff in order to guarantee proper operation of SHPS Potochnitsa.	
CL7: Please clarify if the project makes provisions for meeting training and maintenance needs.	Table 2: A.4.3.5	1. EPC Agreement with the Purchaser makes the necessary provisions for training of operation staff. 2. Current maintenance needs are according to EPC Agreement and are describe in the above response.	Please insert this information in the PDD. O.K. Text inserted on item D.4 of PDD version 6.0.
CL8: Please, refer to the latest version (10) of AMS-I.D.	Table 2: B.1.1	The latest version of AMS-I.D. is Version 12 Sectoral Scope 01, August 10, 2007. Please see on items A.4.4.1., B.1, and D.1. of the PDD the corrections made for the version of applied methodology.	PDD version 5.0 was checked, this version was inserted, and this CL is closed.
CL9: The prevailing practice in Bulgaria in the energy sector is described, but not really the national policies and circumstances relevant to the baseline. Please, clarify.	Table 2: B.2.3	The national policies and circumstances relevant to the baseline are explain in: 1. **Energy Strategy of Bulgaria.** Please see the web site of Ministry of Economy and Energy: (www.doe.bg/download/energiina_strategia/Energy_strategy-Eng2.doc 2. **Bulgarian Power Sector least-cost Development Plan.**	Please, summarize it and insert it in the PDD. O.K. Text inserted on item B.2 and Annex 2 of PDD version 6.0.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		Please see NEK's web site: http://www.nek.bg/tender/nek_mr-info-04.11.2004-ENG.pdf	
CL10: The baseline for the proposed project is not clearly specified. Please, clarify.	Table 2: B.4.1	The baseline of JI project is the scenario that reasonably represents the development and relevant GHG emission rates of Bulgarian Electricity Power System (EPS). The scenario is including all power plants in EPS with power output over 25MW. In the Baseline Scenario the GHG emissions generate by operation of EPS would occur in absence of the proposed project. In the Project Scenario small part of GHG emissions of EPC would be avoided i.e. reduced due, to the JI project power generation. Baseline scenario is the one prescribed in ACM0002 for projects that do not modify or retrofit an existing electricity generation facility, i.e. "electricity delivered to the grid by the project would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources, as reflected in the grid emission factor".	Please, insert it in the PDD. O.K. Text inserted on item B.1 of PDD versio 6.0.
CL11: The date on real action of the project is not properly defined. Please, clarify.	Table 2: C.1.1	According to the time schedule, project commission date would be July 01, 2009. Please see correction made on item C.1. of	PDD version 5.0 was checked, this date was inserted, and this

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		PDD.	CL is closed.
CL12: Please, clarify if the assumptions used to calculate baseline emissions are conservative.	Table 2: E.4.3	1. Default IPCC values from the *IPCC 1996 Revised Guidelines and the IPCC Good Practice Guidance* for net calorific values and corresponding carbon emission factors for fuels are use for justification of plant-specific values. 2. Justification is made for carbon emission factors and fuel oxidation factors between calculated plant specific values and default IPCC values. Comparison between findings and default values could expressed as follows: 2.1) plant specific carbon emission factors *CEFi* are lower than IPCC default values. Thus, *CEFi* are consider conservative, because lead to lower emission rates. 2.2) plant specific fuel oxidation factors *OXIDi* are higher than IPCC default values. Therefore, *OXIDi* are conservative, because express lower *COEFi*. 2.3) Specific plant emission coefficient *COEFi*, is lower than 2006 IPCC default values and that lead to lower emissions reductions. Thus emission coefficient *COEFi* is conservative i.e. lowest and is expressed with the equation:	Please, insert it in the PDD. O.K. Text and tables inserted on Annex 2 of PDD version 6.0.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		$COEF_i = \frac{NCV_i * CEF_i * (100 - OXID_i) * (44/12)}{100}$ 3. Two baseline scenarios with emission calculations are develop according to the Minimum and Maximum demand forecast of EPS. The Maximum demand scenario is chosen because it lead to lower emission rates, thus is consider conservative. 4. Justification is made in reference to file < SHPS Potochnitsa Baseline Calculations 29Nov2007> with calculations of baseline emission factor (*EFy)*.	
CL13: Please clarify why the emission factor is calculated as the weighted average between the emission factor of the Simple Operation Margin and the Build Margin emission factor, and no other option for this calculation was chosen.	Table 3: 3.3.1	The baseline emission factor (EF_y) is calculated as a combined margin (CM), consisting of the combination of operating margin (OM) and build margin (BM) factors according to three steps. Power plant capacity additions as JI projects in the country are excluded from all further calculations. **First STEP. Calculate the Operating Margin emission factor(s) (*EFOM,y*)** based on one of the four following methods: 1. The **Dispatch Data Analysis OM** must be the first methodological choice. Due to	PDD version 5.0 was checked, this information was inserted in item B.1., and this CL is closed.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		absence of detail dispatch data to apply this method, this option is consider being not applicable. 2. The **Simple OM** can only be used where LC&MR power plants constitute less than 50% of total grid generation. This stipulation is fulfilled and Simple OM method is applicable. 3. The **Average OM** method could only be used where: 3.1) LC&MR power plants constitute more than 50% of total power grid generation 3.2) The detailed data to apply the last possible option applying Simple adjusted OM method are not available. In our case the needed data to apply Simple adjusted OM method are available and LC&MR power plants constitute less than 50% of total power generation. Therefore, Average OM method is not allowed, according to the above conditions and is applied in Baseline calculations only for consistency of the possible results in calculating the emission rate. 4. Simple adjusted OM method is variation of Simple OM method and is applied considering the following conditions: 4.1) Stipulations for using Simple OM method are fulfilled.	

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		4.2) Detailed data sets for applying Simple adjusted OM method are available. Simple adjusted OM method take into consideration additionally number of hours per year for which LC&MR power units are operating on the margin. Implementation of this method give the opportunity for determination of all power units operating at the margin with there specific hours of operation and is first approximation of Dispatch Data Analysis OM method. In conclusion Simple adjusted OM method is allowed and is being utilize for this project. 5. The line of weighted average load of LC/MR power plants during the years doesn't intersect the annual Load Duration Curve. Therefore, LC/MR doesn't operate on the margin, thus **Simple OM** emission factor is the same as **Simple Adjusted OM** emission factor. Please see the added wording on item B.1. of the PDD.	
CL14: Please, clarify why electricity production was not calculated considering the formula presented at item 10 of the methodology?	Table 3: 3.3.2	Citation of Item 10 wording of the methodology is as follows: " *In the case of projects that involve the addition of renewable energy generation units at an existing renewable power generation facility, where the*	Please, insert it in the PDD. O.K. Text inserted on item E.4 27 of PDD version 6.0.

Draft report clarifications and corrective action requests by determination team	Ref. to checklist question in tables 2, 3 and 4	Summary of project owner response	Determination team conclusion
		existing and new units share the use of common and limited renewable resources (e.g. stream-flow, reservoir capacity, biomass residues), the potential for the project to reduce the amount of renewable resource available to, and thus electricity generation by, existing units must be considered in the determination of baseline emissions, project emissions, and/or leakage, as relevant" *For projects that involve the addition of new generation units (e.g. turbines) at an existing facility, the increase in electricity production associated with the project (EGy in MWh/ year) should be calculated as follows:* ***EGy = TEy – WTEy*** *Where:* ***TEy -** is the total electricity produced in year y by all units, existing and new project units;* ***WTEy -** is the estimated electricity that would have been produced by existing units (installed before the project) in year y in the absence of the project, where…."* SHPS Potochnitsa is completely new JI project, therefore the above mentioned item 10 in the methodology is considered not relevant, by the reason of non-existing power units in the project boundary.	