



**PROJECT
DEVELOPER
FORUM**

Completeness Check
- Incompleteness Notes

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Database of Incompleteness Notes

– Registration: 66 projects / 222 issues

Database of CDM Incompleteness Issues - Registration															
(from EB 54: Completeness Check in 7 days + from Information & Reporting Check in 23 days) (Template Version 0, 29/06/2010)															
Updated: 8/10/2010															
Project	Completeness Check (7d) or Info & Reporting Check (23d)	Checking Loop	Date Received	Host Country	Methodology (version)	Project Type	DoE	Questions	Category	Sub-category	Further elaboration	DOE Liability	DOE Liability Categories	Referred Document	PP comment
2	Minor Correction (Before EB 54)	Loop 1	07/01/2009	China	ACM002 ver.6	Hydro	DNV	Minor issue 1: Further clarification is required on how the DOE has validated the suitability of the input values to the investment analysis, as per the guidance of EB 38 paragraph 54(c).	Major			Yes	1.2 improper validation of common practice or sensitivity analysis	Validation Report	
2	Minor Correction (Before EB 54)	Loop 1	07/01/2009	China	ACM002 ver.6	Hydro	DNV	Minor issue 2: Further clarification is required how the DOE has validated the common practice analysis, in particular, the scale of similar project activities and the essential distinction between the project activity and similar projects considered based on higher unit cost.	Major			Yes	1.3 improper validation according to published EB guidelines	Validation Report	
2	Minor Correction (Before EB 54)	Loop 1	07/01/2009	China	ACM002 ver.6	Hydro	DNV	Minor issue 3: The DOE is requested to confirm that the ex-ante emission factor of 0.8434 tCO ₂ /MWh complies with the requirements of the methodology regarding the use of the most up-to-date data at the time of validation as the FDD for the GSC used a different emission factor (0.778 tCO ₂ /MWh). If not, the emission factor should be based on the latest available data at the time of	Major			Yes	1.1 lacking explanation (reporting duty) in validation report where key data has changed from GSC FDD to	Validation Report and/or FDD	

– Issuance: 22 projects / 40 issues

Database of CDM Incompleteness Issues - Issuance															
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Updated: 8/10/2010															
Project	Completeness Check (7d) or Info & Reporting Check (23d)	Checking Loop	Date Received	Host Country	Methodology (version)	Project Type	DoE	Questions	Category	Sub-category	Further elaboration	DOE liability	DOE Liability Categories	Referred Document	PP Comment
1	Completeness Check (Before EB 54)		11/08/2009	Israel	AM0034 (ver02)	Nitric Acid N2O	DNV	In accordance with para.5 of Annex 22 EB38, the project participant is required to submit all monitored data at the intervals required by the registered monitoring plan, and the report shall be supplied in a format that allows for assessment by the RT member (para.109 EB26). However, in your submitted CER spreadsheets titled 1370-Monitoring-results_baseline-Historic and 1370/N4-No1_ghg-calculation, only aggregated hourly data and final calculation results are presented while the calculation steps from the monitored data to the final results are missing.	Minor 1 - retroactive application of requirements	1.3 application of a requirement that did not exist (or were not applicable) at the time of submission	MINOR: Previously only hourly data were submitted and found acceptable by DOEs and UNFCCC. Frequency of 2 seconds is enormous data volume. Besides all calculations in AM0034 (versions 1 through 3) are done with hourly values.			Monitoring Report	
2	Completeness Check (Before EB 54)		11/08/2009	Israel	AM0034 (ver02)	Nitric Acid N2O	DNV	In order to allow for assessment by the RT member, the data spreadsheets shall reveal the calculation steps (including the calculation formula), and in particular, the following steps as specifically required by the methodology shall be included: i) the statistical analysis of the historical data (in establishing permitted ranges), ii) the statistical calculation procedure for baseline campaign as well as project campaign data - a) calculate the sample mean, b) calculate the sample standard deviation, c) calculate the 95% confidence interval, d) eliminate all data that lie outside the 95% confidence interval, and e) calculate the new sample mean from left remaining values. ii) the calculation relating to	Minor 1 - retroactive application of requirements	1.3 application of a requirement that did not exist (or were not applicable) at the time of submission	MINOR: it was not previously required to submit the spreadsheets with all calculations. This could have been a request for more information for the convenience of the secretariat (naturally all calculations are ...			Monitoring Report (supporting data)	

– Caveat: Voluntary reporting from PDF membership only

Incompleteness messages

- Many messages are valid
 - Missing documents, dates, signatures
 - Typos, versions, inconsistencies
 - Small mistakes, eg calculated rather than metered or vice versa (although that may be just as good)
 - We are all striving for higher quality
- However, many issues turn out to be very minor
 - Could be dealt with more efficiently, eg by contacting DOE/PP and not throwing the projects out completely (that duplicates the work on completeness check)
 - Issues “not material”, no impact on the project activity or environmental integrity

- Incomplete message example

• Comment

- “Substantiate input values” (many times)
 - This reduces review cases. (Often retroactive)
- “Provide confirmation that the crediting period will not commence prior to the date of registration.”
 - Minor / unnecessary
- “Further explain how the input value of investment cost in the investment analysis is suitable, as the actual contracts for turbine and construction, as the main part of the investment, contribute only 75% of total estimated investment cost.”
 - Lack of understanding (not a transparency issue)
- “Explain how the input values are suitable, as it is uncertain whether the document was available prior to the decision to the start date of the project activity.”
 - Lack of understanding / making assumption (not a transparency issue)

- Incomplete message example

• Comment

- “The monitoring report states that the first calibration was done after the start of operation.”
 - Lack of understanding
- “Spreadsheet is protected. Submit without protection.”
 - Minor (ask for the password)
- Inconsistency between CAR/CL answers and final documents
 - CAR/CL resolved some time before the final document which was further changed for other reasons, so no inconsistency
- “DOE shall provide direct confirmation of correctness of ...”
 - Minor, overall correctness is confirmed
 - Could be resolved through electronic reports / mandatory fields

- Incomplete message example

• Comment

- “Geo coordinates in view page are missing” (many times)
 - Very minor. Also during the I&R check which is incorrect.
- “The methodology is identified as AM0032 in the certification statement while the applied methodology for the project is AM0034”
 - Typo
- “In view page the first crediting period is only 6 years”
 - Typo
- “The date on page 1 of the verification report is not in English”
 - Typo
 - Of course it’s the job of the DOE to avoid typos, but many validators are not native English speakers
- “The MOC copy is not clear”

- Incomplete message example

• Comment

- “Further details regarding the common practice should be provided”
 - Unjustified query / same analysis as other projects
- “Spreadsheet only contains the EF calculation, not ERs”
 - This is not a requirement.
- “Please merge the LoAs into one single document. Note that each Annex-I Party is listed only once on the project view-page.”
 - Retroactive application.
- “Comparison of the actual CERs claimed in the monitoring period with the estimate in the PDD is missing in the monitoring report .”
 - Retroactive application.
 - OK, maybe not strictly retroactive, but it certainly was never asked for before
- “Clarify the content of the spreadsheets submitted”
- “The PP/DOE are advised to update the version of the methodology”
 - Meth valid at time of submission

Incompleteness Notes - Categories

- **Major Issues**
- **Minor Issues**
 - **Retroactive application of requirements**
 - Issues checked that have not been on the cc list at the point of submission
 - Issues that have not been requested in previous submissions
 - Application of a requirement that did not exist (or were not applicable) at the time of submission
 - **Typos & formatting & missing dates**
 - Issues identified in incompleteness note as typo
 - Issues that seem major but turn out to be only a typo
 - Formatting
 - Missing dates, units or formulae
 - **Missing documents**
 - Missing documents (uploaded not attached)
 - Missing signatures

(Un) Helpful process?

- Has it reduced reviews? No
 - Projects going through completeness check pre-21 Jun 10:
~ 0.5 request for review per day; today: ~ 1 per day
- Is it saving time? Not at the moment
 - Time to go through review < completeness check
- But of course documentation should be “complete” and quality could be improved
- Where is the failure? Who is to blame?
 - All
 - Often last-minute adjustment are made in lieu of the latest guidance/reviews/incompleteness or by TR, which leads to minor changes and not all inconsistencies are picked up
- Messages not published so limited learning by doing

Suggestions

- Improve quality of submissions
- Appropriate software
 - Would have avoided at least 15%-20% of all incompleteness issues
- Call the DOE / PP to resolve the issue immediately
 - Data missing, or understanding
 - Could avoid probably well over 50% of all issues
- Avoid retroactive application
 - Both actual guidance and new interpretations
 - Some form of historic precedent
 - Could avoid probably 10%-20% of all issues
- Some things are just not important
 - No impact on project quality and/or environmental integrity
 - May be resolved through FAR-type action
- Allow voluntary incompleteness
 - Or correction prior to actual completeness started
- Publish incompleteness messages