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CLEAN DEVELOPMENT MECHANISM PROJECT DESIGN DOCUMENT FORM (CDM-PDD) (Version 02 - in effect as of: 1 July 2004)

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SECTION A. General description of project activity

A.1 Title of the <u>project activity</u>:

Nova América Bagasse Cogeneration Project (NABCP) Version 2 B Date of the document: December 02nd, 2005.

The only changes made to this version of the PDD compared to the PDD version Rev.2 dated 14/09/2005 referred to in the letter of approval of the DNA of Brazil are related to the recalculation of the build margin emission factor with the plant efficiencies recommended by the CDM Executive Board at its 22nd meeting.

A.2. Description of the <u>project activity</u>:

This project activity consists of increasing efficiency in the bagasse (a renewable fuel source, residue from sugarcane processing) cogeneration facility at **Usina Nova América S/A** (Nova América), a Brazilian sugar mill. With the implementation of this project, the mill is able to sell electricity to the national grid, avoiding the dispatch of same amount of energy produced by fossil-fuelled thermal plants to that grid. By that, the initiative avoids CO_2 emissions, also contributing to the regional and national sustainable development.

By investing to increase in steam efficiency in the sugar and alcohol production and increase in the efficiency of burning the bagasse (more efficient boilers), Nova América generates surplus steam and uses it exclusively for electricity production (through turbo-generators).

The sponsors of the NABCP are convinced that bagasse cogeneration is a sustainable source of energy that brings not only advantages for mitigating global warming, but also creates a sustainable competitive advantage for the agricultural production in the sugarcane industry in Brazil. Using the available natural resources in a more efficient way, the Nova América project activity helps to enhance the consumption of renewable energy. Besides that, it is used to demonstrate the feasibility of electricity generation as a side-business source of revenue for the sugar industry. It is worthy to highlight that out of approximately 320 sugar mills in Brazil, the great majority produces energy for on-site use only, and not for grid supply, which is mainly due to the low-efficiency of the cogeneration equipment installed on those sugar mills.

Furthermore, bagasse cogeneration also plays an important role on the country's economic development, as Brazil's sugarcane-based industry provides for approximately 1 million jobs and represents one of the major agribusiness products within the trade balance of the country. The Brazilian heavy industry has developed the technology to supply the sugarcane industry with equipments to provide expansion for the cogeneration, therefore such heavy industry development also helps the country to create jobs and achieve the sustainable development.

Bagasse cogeneration is important for the energy strategy of the country. Cogeneration is an alternative that allows postponing the installation and/or dispatch of thermal energy generation utilities. The sale of the CER generated by the project will boost the attractiveness of bagasse cogeneration projects, helping to increase the production of this energy and decrease dependency on fossil fuel.



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Nova América also believes that sustainable development will be achieved not only by the implementation of a renewable energy production facility, but also by carrying out activities which corresponds to the company social and environmental responsibilities, as described below:

Social Contribution

Nova América is a Brazilian private company founded in 1947, with headquarters located in Tarumã, a city in the state of São Paulo's west region. It employs 1.100 people directly and 3.000 indirectly, being the major employer in its municipality area. In the 2001/2002 harvesting season, the company crushed 3,29 million ton of sugarcane, producing 107.500 m^3 of ethanol and 257,5 thousand ton of sugar. In the 2004/2005 harvesting season, the company crushed 3.527 ton of sugarcane , 120.350 m^3 of ethanol and 281.350 ton of sugar.

Searching continuous improvements in the productive performance, Nova América gives special attention to its human resources. To encourage its employees to be deeply engaged with the results of the company, Nova América has always developed human resources social services. The company believes that the employees' contribution to increasing the quality of the products is heavily dependent on their quality of life. In order to achieve a top quality human resource management, the company focuses special attention on the work safety and health care.

Nova América has also been congratulated on many social initiatives, receiving awards from ABRINQ (Toys Manufacturers Brazilian National Association), as a company "friend of the children"; from ADVB (Brazilian Association of Sales Directors); from AMCHAM (The American Chamber of Commerce) the company was awarded the most prestigious award for citizenship initiatives, as a winner of Prêmio ECO, under the "Culture" category. Nova América Group, to which belongs Usina Nova América, maintains a great social initiative called Projeto Futuro. Its aim is to educate children and teenagers through social and cultural activities and professional formation. It was started in 1987 and aggregates nowadays around 250 participants, from 7 to 18 years old, living in the municipalities of Maracaí, Frutal do Campo e Tarumã, all regularly registered in the official educational system. The initiative is subdivided in 6 groups, such as theatre, choir, and environmental education. The "Projeto Futuro" offers children uniforms, food, school material, medical assistance, psychological assistance, medicines and leisure in the company's clubs. The results from these activities involve numerous prizes, possibility to Record a CD, native vegetation reconstitution and great production of vegetables and legumes. Nova América also promotes volunteer work to improve the surrounding communities quality of life.

Environmental Contribution

NABCP is not the first attitude towards the environment Nova América establishes. The company has considerably improved the natural area and the landscape in the region where it actuates, planting native ciliate vegetation, from the seedlings developed within environmental education group in the Projeto Futuro, mentioned above. Nova América also preserves local native vegetation areas, and works to repopulate native forests fragments and make them complete ecosystems, eliminating the problem of a same species concentration in a small forest area.

Increasing the firm's annual revenues due to CERs commercialization adds substantial value to the direct employees of the firm, its sugarcane providers, their families and the local community.



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A.3. <u>Project participants</u>:

Usina Nova América S/A (Nova América), a Brazilian private company. Econergy Brasil Ltda., a Brazilian private company.

A.4. Technical d	lescriptio	on of the <u>project activity</u> :		
A.4.1. Location of the <u>project activity</u> :				
A.4	.1.1.	Host Party(ies):		
Brazil				
A.4	.1.2.	Region/State/Province etc.:		
São Paulo				
A.4	.1.3.	City/Town/Community etc:		
Tarumã				

A.4.1.4. Detail of physical location, including information allowing the unique identification of this <u>project activity</u> (maximum one page):

Tarumã is located west in the State of São Paulo, in the agricultural region of Assis, as can be seen in Figure 1.



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Source: Elaborated from Coordenadoria de Assistência Técnica Integral (CATI)¹ Figure 1: Geographical position of the city of Tarumã

A.4.2. Category(ies) of project activity:

Sectorial Scope: 1-Energy industries (renewable - / non-renewable sources)

¹ http://www.cati.sp.gov.br/



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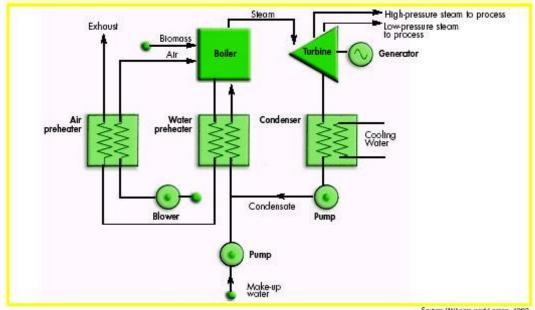
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A.4.3. Technology to be employed by the project activity:

The predominant technology in all parts of the world today for generating megawatt (MW) levels of electricity from biomass is the steam-Rankine cycle, which consists of direct combustion of biomass in a boiler to generate steam, which is then expanded through a turbine. Most steam cycle plants are located at industrial sites, where the waste heat from the steam turbine is recovered and used for meeting industrial process heat needs. Such combined heat and power (CHP), or cogeneration, systems provide greater levels of energy services per unit of biomass consumed than systems that generate electric power only.

The steam-Rankine cycle involves heating pressurized water, with the resulting steam expanding to drive a turbine-generator, and then condensing back to water for partial or full recycling to the boiler. A heat exchanger is used in some cases to recover heat from flue gases to preheat combustion air, and a deaerator must be used to remove dissolved oxygen from water before it enters the boiler.

Steam turbines are designed as either "backpressure" or "condensing" turbines. CHP applications typically employ backpressure turbines, wherein steam expands to a pressure that is still substantially above ambient pressure. It leaves the turbine still as a vapour and is sent to satisfy industrial heating needs, where it condenses back to water. It is then partially or fully returned to the boiler. Alternatively, if process steam demands can be met using only a portion of the available steam, a condensing-extraction steam turbine (CEST) might be used. This design includes the capability for some steam to be extracted at one or more points along the expansion path for meeting process needs (Figure 2). Steam that is not extracted continues to expand to sub-atmospheric pressures, thereby increasing the amount of electricity generated per unit of steam compared to the backpressure turbine. The non-extracted steam is converted back to liquid water in a condenser that utilizes ambient air and/or a cold water source as the coolant².



Source: Williams and Larson, 1993

Figure 2: Schematic diagram of a biomass-fired steam-Rankine cycle for cogeneration using a condensingextraction steam turbine

² Williams & Larson, 1993 and Kartha & Larson, 2000, p.101



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The steam-Rankine cycle uses different boiler designs, depending on the scale of the facility and the characteristics of the fuel being used. The initial pressure and temperature of the steam, together with the pressure to which it is expanded, determine the amount of electricity that can be generated per kilogram of steam. In general, the higher the peak pressure and temperature of the steam, the more efficient, sophisticated, and costly the cycle is.

Cost-effective changes to reduce process steam demand, added to the substitution of low efficient steam turbines by higher ones, can meet process electricity and heat needs and also generate an additional amount of electricity available for export purposes.

For improving its cogeneration system, the company deactivated four 1,6 MW backpressure turbogenerators and installed one 16,5 MW backpressure turbo-generators, along with a refurbishment of a thirteen single-stage backpressure turbines to thirteen multi-stage backpressure turbines, plus improving the efficiency of steam use. Nova América envisaged the possibility of increasing the capacity and, using the same amount of steam, produce more renewable electricity from the bagasse generated in its milling process.

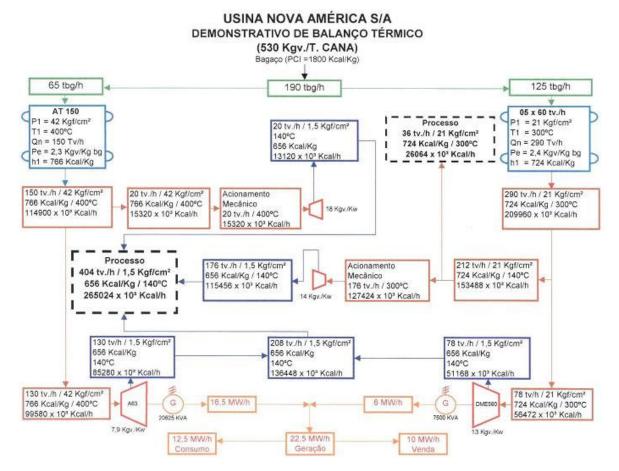


Figure 3: Nova América's Energy Balance Diagram



Table 1 below summarizes the upgrades in the cogeneration facility at Nova América.

Table 1: Cogeneration equipment upgrades

		Deactivating			
Before The Expansion Plan (Until 2000)	One 6 MW backpressure turbo generator	Four 1,6 MW backpressure turbo- generators			
	One 42 bar boiler and five 21 bar boilers	Thirteen single-stage backpressure turbines			
After the Expansion Plan	One 16,5 MW backpressure turbo generator		One 42 bar boiler and five 21 bar boilers	One 6 MW backpressure turbo generator	Four 1,6 MW turbo
	Thirteen multi-st backpressure tur	0			generators

A.4.4. Brief explanation of how the anthropogenic emissions of anthropogenic greenhouse gas (GHGs) by sources are to be reduced by the proposed CDM <u>project activity</u>, including why the emission reductions would not occur in the absence of the proposed <u>project activity</u>, taking into account national and/or sectoral policies and circumstances:

By dispatching renewable electricity to a grid, electricity that would otherwise be produced using fossil fuel is displaced. This electricity displacement will occur at the system's margin, i.e. this CDM project will displace electricity that is produced by marginal sources (mainly fossil fueled thermal plants), which have higher electricity dispatching costs and are solicited only over the hours that baseload sources (low-cost or must-run sources) cannot supply the grid (due to higher marginal dispatching costs or fuel storage – in case of hydro sources – constraints).

Bagasse is a fibrous biomass by-product from sugarcane processing, which accounts for about 25 percent on weight of fresh cane and approximately one third of the cane's energy content. In a typical Brazilian sugarcane mill, burning bagasse for generation of process heat and power production is a practice already established. It is estimated that over 700 MW of bagasse-based power capacity is currently installed in the state of São Paulo only³. The energy produced from these facilities is almost all consumed for their own purposes. Because of constraints that limit the access of independent power producers to the electric utilities market, there is no incentive for sugarcane mills to operate in a more efficient way. Low-pressure boilers, very little concern with optimal use and control of steam, crushers mechanically activated by steam, energy intensive distillation methods, are a few examples of inefficient methods applied to the sugar industry as normal routine.

³ São Paulo. Secretary of Energy, 2001.



The Brazilian electric sector legislation currently recognizes the role of independent power producers, which has triggered interest in improving boiler efficiency and increasing electricity generation at mills, allowing the production of enough electricity not only to satisfy sugar mills' need but also a surplus amount for selling to the electricity market. Furthermore, the ever increasing electricity demand opens an opportunity for some bagasse cogeneration power plants in Brazil. Additionally, the feature of electricity generation system - the most important electricity source in the country - is under stress, should provide considerable complementary energy and make bagasse cogeneration electricity attractive for any potential purchasers.

Nevertheless, some barriers pose a challenge for implementation of this kind of projects. In most cases, the sponsors' culture in the sugar industry is very much influenced by the commodities – sugar and ethanol – market. Therefore, they need an extra incentive to invest in electricity production due to the fact that it is a product that can never be stored in order to speculate with price. The Power Purchase Agreement (PPA) requires different negotiation skills, which is not the core of the sugar industry. For instance, when signing a long-term electricity contract, the PPA, a given sugar mill has to be confident that it will produce sufficient biomass to supply its cogeneration project. Although it seems easy to predict, the volatility of sugarcane productivity may range from 75 to 120 ton of sugarcane per hectare annually depending on the rainfall. So, the revenue from GHG emission reductions and other benefits associated with CDM certification offer a worthy financial comfort for the sugar mills, like Nova América, which is investing to expand its electric power generation capacity and to operate in a more rationale way under the above mentioned new electric sector circumstances.

A.4.4.1. Es <u>ed</u> :	stimated amount of e	emission reductions over the chosen
Years		Annual estimation of emission reductions in tonnes of CO ₂ e
20/05/200)1	10.843
2002		12.360
2003		12.060
2004		11.062
2005		12.047
2006		12.047
2007		12.047
19/05/200	08	1.721
Total estimated reduction (tonnes of CO ₂ e)	s	84.187

This project activity is to reduce **84.187** tCO₂e over 7 years.



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Total Number of crediting years	7
Annual average over the crediting period of estimated reductions (tonnes of CO ₂ e)	12.027

Emission reductions produced until 2004. Data for 2005 and on are estimates.

A.4.5. Public funding of the project activity:

There is no public funding from Parties included in Annex I in this project activity.

SECTION B. Application of a baseline methodology

B.1. Title and reference of the approved baseline methodology applied to the project activity:

AM0015: Bagasse-based cogeneration connected to an electricity grid.

B.1.1. Justification of the choice of the methodology and why it is applicable to the <u>project</u> <u>activity:</u>

This methodology is applicable to NABCP due to the fact that (i) the bagasse is produced and consumed in the same facility – Nova América -; (ii) the project would never be implemented by the public sector, as well as it would not be implemented in the absence of CDM, as shown in the additionality chapter below; (iii) there is no increase on the bagasse production due to the project activity itself/ and (iv) there will be no bagasse storage for more than one year.

B.2. Description of how the methodology is applied in the context of the project activity:

The project activity follows the steps provided by the methodology taking into account the (b) Simple Adjusted OM calculation for the STEP 1, since the would be no available data for applying to the preferred option -(c) Dispatch Data Analysis OM. For STEP 2, the option 1 was chosen. The following table presents the key information and data used to determine the baseline scenario.

ID number	Data type	Value	Unit	Data Source
1. EG _y	Electricity supplied to		MWh	Project owner
	the grid by the Project.	throughout		
		project		
		activity		
		lifetime.		
2. EF _y	CO ₂ emission	0,2677	tCO2e/MWh	Calculated
-	factor of the			
	Grid.			
3. EF _{OM,y}	CO ₂ Operating	0,4310	tCO ₂ e/MWh	This value was calculated
	Margin emission factor			using data information from
	of the grid.			ONS, the Brazilian
				electricity system manager.



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4. EF _{BM,y}	CO ₂ Build	0,1045	tCO ₂ e/MWh	This value was calculated
	Margin emission factor			using data information from
	of the grid.			ONS, the Brazilian
				electricity system manager.
10. λ _y	Fraction of time during	$\lambda_{2002} = 0,5053$	-	This value was calculated
	which low-cost/	$\lambda_{2003} = 0,5312$		using data information from
	must-run sources are on	$\lambda_{2004} = 0,5041$		ONS, the Brazilian
	the margin.			electricity system manager.

B.3. Description of how the anthropogenic emissions of GHG by sources are reduced below those that would have occurred in the absence of the registered CDM <u>project activity</u>:

Application of the Tool for the demonstration and assessment of additionality for NABCP.

Step 0. Preliminary screening based on the starting date of the project activity

(a) The starting date of this project falls after 1 January 2000, which is evidenced by the request of an Environmental Installation Licence of Usina Nova América S/A in 22^{nd} of March 2001, following.



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(b) Nova América would not initiate the project in the absence of CDM. Seeking to incorporate this new source of funding in the company's project, Mr. Renato Dias de Gouvêa, who was then director of Rezende Barbosa S.A., holding company which owns Usina Nova América, participated in the event "CDM: the Source of Funding for Projects", organized in 2000 by Escola de Administração de Empresas de São Paulo (EAESP/FGV), considered one of the top business schools in Brazil. In that event, there were presentations from Mr. José Domingos Gonzales Miguez, currently a member of the CDM Executive Board, and Edwin Alders from SGS, who might evidence that CDM was considered in the decision to proceed with NABCP.

Step 1. Identification of alternatives to the project activity consistent with current laws and regulations.

Sub-step 1a: Define alternatives to the project activity

1. There were only two possibilities to implement this project activity: one was to continue the current situation of the sugar mill, focusing only on the production of sugar and alcohol and thus investing to enhance the efficiency and increasing the scale of its core business. The other option was the project activity undertaken, which is the investment made to increase steam efficiency and production for electricity sales purposes by acquiring high-efficiency boilers and turbo-generators.

Sub-step 1b: Enforcement of applicable laws and regulations

2. The alternative, which is to continue with the BAU situation before the decision of implementing this CDM project activity is consistence with the applicable laws and regulations.

3. Non applicable.

4. Both the project activity and the alternative scenario are in compliance with all regulations.

Step 3. Barrier analysis

Sub-step 3a: Identify barriers that would prevent the implementation of type of the proposed project activity

1. According to COELHO (1999)⁴, "large scale cogeneration program in sugar-alcohol sector has not yet occurred, due to several barriers, mainly economic, political and institutional", such as:

I. Technological Barriers

Technological barriers represent a very important issue for increasing bagasse cogeneration in Brazil, as – despite the fact that Rankine-cycle is a well known technology – the cogeneration units operate with low-efficiency and are not competitive comparing to other generation options. In this way there is a tricky issue about technology and economic value for such technology. Although this technology is well developed, the economic value for its application is not present for projects on the scale similar to the sugar mills in Brazil. COELHO (1999) justifies that by highlighting that the unit costs (\$/installed MW) are significantly influenced by the scale-effect. As the bagasse cogeneration unit should have a small

⁴ COELHO, Suani T. *Mecanismos para implementação da cogeração de eletricidade a partir de biomassa*: um modelo para o Estado de São Paulo. São Paulo: Programa interunidades de pós-graduação em energia, 1999.



scale due to the high cost for transportation of the fuel (bagasse), investments are high. Therefore, as a lower cost of capital is wanted, the result is a simplified installation and lower efficiency.

COELHO (1999) also states that the great majority of the sugar mills still rely on inefficient technology, such as on 22 bar pressure boilers, even in the state of São Paulo, the most industrialized in Brazil. Moreover, when there is a necessity to change equipments it is usual not to consider purchasing high-efficiency boilers due to conservativeness, lack of knowledge or even lack of interest to generate surplus steam for electricity sales purposes.

Finally, SWISHER (1997)⁵ considers it difficult to convince the local distributor that the energy to be acquired, generally generated during the harvest season, is sufficiently reliable to be accounted in the distributor's planning.

II. Institutional and Political Barriers

From the electric sector point of view, according to COELHO (1999), acquiring electricity other than hydroelectric would not be a priority, arguing that since bagasse based electricity is generated only during the harvest season, no firm energy could be offered. However, the biggest advantage of bagasse based electricity is that it is produced during the period where hydroelectric plants face difficulties due to the low level of rainfall. As a result, COELHO (1999) suggests that there is a significant prejudice and conservativeness of the distributors when deciding whether to purchase bagasse based energy or not.

From the sugar mill point of view, save rare exceptions, COELHO (1999) says that the great majority of sugar mills do not consider investments in cogeneration (for electricity sale) as a priority. The sector "even in the new political context, does not seem to have motivation to invest in a process that it sees with mistrust and no guarantees that the product will have a safe market in the future. Moreover, it is a fact that "the sugar mills are essentially managed by families, which hurdles the association with external financial agents", that would allow the sector to be more competitive and diversifying its investment.

From the point of view of the economic agents, the excessive level of guarantees required to finance the projects is a common barrier to achieving a financial feasibility stage, deeply discussed in SWISHER (1997).

Other barriers have more to do with the lack of adequate commercial contractual agreements from the energy buyers (i.e. bankable long-term contracts and payment guarantee mechanisms for noncreditworthy local public-sector and private customers) making it much more difficult to obtain longterm financing from a commercial bank and/or a development bank. Some other financing barriers occur simply due to prohibitively high transaction costs, which include the bureaucracy to secure the environmental license.

Since 1997, according to SWISHER (1997), the announcement of a Cogeneration Decree has been awaited, and that was supposed to have a positive influence on corporate decision-making with respect to biomass project implementation. The original Cogeneration Decree proposal, which was never approved, called for mandatory purchase by the regional utilities - "concessionárias" - from cogenerating and self-

⁵ SWISHER, J. *Using area-specific cost analysis to identify low incremental-cost renewable energy options:* a case study of co-generation using bagasse in the State of São Paulo. Washington DC: Prepared for Global Environment Facility (GEF) Secretariat, 1997.

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generating facilities⁶. Instead of renewable energy, the government expansion plan for electric energy, approved in February 2000 is based on fossil fuel – Natural Gas. This expansion plan called Thermoelectricity Priority Plan (PPT) became a reality right before the energy crisis. The Thermoelectricity Priority Plan beneficiaries, which were mainly natural gas thermal plants, through the Ministry of Mines and Energy (MME) Decree 3.371 from February 2000, counted on guaranteed, long term and attractive price conditions on Natural Gas supply and Energy sales, together with financing from the national development bank BNDES. And though the PPT plan is not likely to be fully implemented, the public-sector policies for renewable energy are not considered reliable enough by the executives of the private sector to support cogeneration expansion in the sugar mills. This assumption is clearly shown in the following list of rules and/or regulations in the energy sector that have been set in the last 10 years:

- March 1993: Law 8.631 sets a tariff regulation for electric energy;
- February 1995: Law 8.987 establish public concession for energy;
- July 1995: Law 9.074 regulates concession for electric energy sector;
- December 1996: Law 9.427 creates National Energy Agency (ANEEL);
- August 1997: Law 9.478 sets the National Council for Energy Planning (CNPE);
- October 1997: Decree 2.335 regulates the ANEEL task;
- December 1997: Implements ANEEL;
- May 1998: Law 9.648 establishes the Spot Market for Electric Energy (MAE) and the Operator National System (ONS);
- July 1998: Decree 2.655 regulates MAE and ONS tasks;
- February 2000: Decree 3.371 regulates the Thermoelectricity Priority Plan (PPT);
- April 2002: Law 10.438 sets the Program for Incentive Alternative Energy (PROINFA), stating that contracts shall be signed within 24 months from its date and that there will be different economic values for the acquisition of 3.300MW of electricity capacity from renewable sources by the state owned Eletrobrás, for plants starting operations before December 30, 2006;
- August 2002: MP 64 is a presidential act to change the constitution in order to permit the energy sector regulation including the PROINFA;
- **December 2002**: Resolution 4.541 from ANEEL regulates the implementation of PROINFA, stating that economic values would be defined within 90 days;
- March 2003: Decree 4.644 postponed for 180 days, from its date, the economic value and operational guidelines announcement;

⁶ Presidential Decree on the co-generation of electric energy, draft of 5 August 1997.



- **June 2003**: Decree 4.758 indefinitely postponed the date for the economic value and operational guidelines announcement and revoked the above mentioned Decree 4.644.
- November 2003: Law 10.762 of 11 November/03 revised Law 10.438 of 26 April 2002 institutes PROINFA.
- March 2004: Decree 5.025 regulates the Law 10.438 as of 26 April 2002.

For this CDM project analysis purposes, at the time the project started there were no institutional incentives like PROINFA to be considered. Therefore, the company's decision to sign a long-term PPA with the local distributor undoubtedly represented a significant risk that the mill was willing to take, partially thanks to the expected CDM revenue.

III. Economic and Investment Barriers

"There are several reasons for the Brazilian utilities' reluctance to offer higher prices for co-generated power. One important reason stems from their assumption that their costs are geographically uniform – i.e., that there is essentially a single value for their avoided cost in the industrial sector. If this cost value does not indicate that sufficient savings are available from buying co-generated power, and then there is little economic motivation, under either a public monopoly or a privatized competitive structure, for a utility to pay enough for co-generation to satisfy potential investors' financial criteria" ⁷ as stated by SWISHER (1997). In fact, the economic cost is the reason that Brazilian utilities do not buy cogeneration electricity energy, at least, while the energy sector regulation does not guarantee them the right to pass such cost through to the end user tariff. The cost of cogeneration electricity ranges from US\$ 35 to US\$ 105 per MWh, according to the Expansion Plan 2001-2010 from Brazil Government, which is described as higher than the marginal cost for electricity expansion in the system – US\$ 33/MWh⁸.

COELHO (1999) also highlights as one of the major problems of selling surplus energy to the grid the economic value paid to the sugar mills which not enough to remunerate the capital invested in the expansion of a cogeneration project. Furthermore, "the fee for accessing the grid does not contribute to making feasible the sale of the surplus energy to the distributors".

Summarizing, SWISHER (1997) considers that the main difficulties are found in: (a) **small sizes of projects and installation costs**: despite the high cost for installation, the fixed cost component is high and cannot be absorbed by the global economic project. (b) **availability of long-term financing**: traditionally, infrastructure projects have had wide access to long-term financing, situation that has changed after the electric sector privatization. (c) **lack of guarantees:** besides technical guarantees, investors require commercial guarantees establishing a paradox: the objective of privatization is to foster a market based economy but banks still require governmental guarantees to ensure long-term investments in the private sector, (d) **lack of local funding**: lack of familiarity with project finance tools and due to the high interest rates in Brazil.

⁷ Joel Swisher personal communication with Rolls Royce Power Ventures project manage. Mark Croke, August 26, 1997. Swisher J. 1997 pg. 76.

⁸ "Como se pode observar, os custos unitários da fontes alternativas de energia ainda são altos comparados ao custo marginal de expansão do sistema, hoje calculado em US\$33/MWh". IN: Brazil, Ministry of Mines and Energy, 2001, pg. 80.

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IV. Cultural Barrier

Due to the nature of the business in the sugar industry the marketing approach is narrowly focused on commodity type of transaction. Therefore, the electricity transaction based on long-term contract (Power Purchase Agreement) represents a significant breakthrough in their business model. In this case, the electricity transaction has to represent a safe investment opportunity from both economical and social-environmental perspective for convincing the sugar mills to invest in.

There are also questions regarding the managerial capacity of the companies that comprise the Brazilian sugarcane industry. According to WALTER (1994)⁹, they have in many cases demonstrated the will to undertake investments in new technologies, but without sufficient financial and entrepreneurial capacity to complete such projects.

Sub-step 3b: Show that the identified barriers would not prevent the implementation of at least one of the alternatives (except the proposed project activity).

The alternative to this project activity was to keep the current situation and focus strictly in its core business which is the production of sugar and alcohol. Therefore, as the barriers mentioned above are directly related to entering into a new business (electricity sale), there is no impediment for sugar mills to maintain (or even invest in) its core business.

Step 4. Common practice analysis.

Sub-step 4a: Analyze other activities similar to the proposed project activity

The sugar sector, historically, always exploited its biomass (bagasse) in an inefficient manner by making use of low-pressure boilers. Although they consume almost all of their bagasse for self-energy generation purposes, it is done in such a manner that no surplus electric energy is available for sale, and no sugar company has ventured in the electricity market until the recent years.

Similar project activities have been implemented by leading companies in this industry, mainly after Vale do Rosário started to implement its project that clearly served as a sector benchmark. However, these are few examples in a universe of about 320 sugar mills. Currently, other similar project activities under implementation are, for example, Cia Energética Santa Elisa, Moema, Equipav, Santa Cândida. All together similar projects in the sugar industry in Brazil are restricted to approximately 10% of the sugar industry, since the other 90% are still burning their bagasse for on-site use only in the old-fashioned inefficient way. That clearly shows that just a small part of this sector is willing to invest in cogeneration projects. Moreover, majority of similar projects currently being implemented are carried out as CDM project activities. So far, Econergy Brasil has reported at least 26 CDM bagasse cogeneration projects in Brazil.

Sub-step 4b: Discuss any similar options that are occurring

This project activity type is not considered as a widely spread activity in Brazil as only a small portion of the existing sugar mills in the country actually produce electricity for sale purposes. Also, most of the existing similar activities are being developed as CDM project activities.

⁹ WALTER, A.C.S. Viabilidade e perspectivas da co-geração e geração termelétrica no setor sucro-alcooleiro, 1994. Thesis (Doctorate). UNICAMP, Campinas.



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Step 5. Impact of CDM registration

The impact of registration of this CDM project activity will contribute to overcoming all the barriers described in this Tool: technological, institutional and political, economic and investment and cultural barriers by bringing more solidity to the investment itself and, therefore, fostering and supporting the project owners' breakthrough decision to expand their business model. In this way, the project activity is already engaged in a deal to sell its expected CERs.

Notwithstanding, the benefits and incentives mentioned in the text of the Tool for demonstration and assessment of additionality, published by the CDM-EB, will be experienced by the project activities such as: the project will achieve the aim of anthropogenic GHG reductions; financial benefit of the revenue obtained by selling CERs will bring more robustness to the project's financial situation; and its likely to attract new players and new technology (there are companies currently developing new type of boilers – extra-efficient – and the purchase of such equipment is to be fostered by the CER sales revenue) and reducing the investor's risk.

B.4. Description of how the definition of the <u>project boundary</u> related to the <u>baseline</u> <u>methodology</u> selected is applied to the <u>project activity</u>:

The definition of the project boundary related to the baseline methodology is applied to the project activity in the following way:

Baseline energy grid: For NABCP, the South-Southeast and Midwest subsystem of the Brazilian grid is considered as a boundary, since it is the system to which Nova América is connected and therefore receives all the bagasse-based produced electricity.

Bagasse cogeneration plant: the bagasse cogeneration plant considered as boundary comprises the whole site where the cogeneration facility is located.

B.5. Details of <u>baseline</u> information, including the date of completion of the baseline study and the name of person (s)/entity (ies) determining the <u>baseline</u>:

- 1. Date of completing the final draft of this baseline section: 02/12/2005.
- 2. Name of person/entity determining the baseline

ECONERGY BRASIL (Contact information in Annex 1), which is a participant in this project, is responsible for the technical services related to GHG emission reductions, and is therefore, in behalf of Nova América, the developer of this document, and all its contents.

SECTION C. Duration of the project activity / Crediting period

C.1 Duration of the <u>project activity</u>:

C.1.1. Starting date of the project activity:

20/05/2001.



25y-0m.¹⁰

C.2 Choice of the <u>crediting period</u> and related information:

C.2.1. Renewable crediting period

C.2.1.1. Starting date of the first <u>crediting period</u>:

20/05/2001.

C.2.1.2. Length of the first <u>crediting period</u>:

7y-0m

C.2.2. Fixed crediting period:

C.2.2.1.

Starting date:

Not applicable

C.2.2.2. Length:

Not applicable

SECTION D. Application of a monitoring methodology and plan

D.1. Name and reference of <u>approved monitoring methodology</u> applied to the <u>project activity</u>:

Approved monitoring methodology AM0015: "Bagasse-based cogeneration connected to an electricity grid"

D.2. Justification of the choice of the methodology and why it is applicable to the <u>project</u> <u>activity</u>:

The monitoring methodology was designed to be applied to the Vale do Rosario CDM Project. Due to the great similarity of the project, the same methodology was chosen in order to monitor the emissions reduction due to NABCP.

The methodology considers monitoring emissions reductions generated from cogeneration projects with sugarcane bagasse. The energy produced by the project could be electricity exported to a grid-connected system and/or energy used to substitute fossil fuel off-grid connected. And that is exactly the case with

¹⁰ Specialists from the Brazilian National Agency of Electric Power (ANEEL - *Agência Nacional de Energia Elétrica*) suggest using 25 years of lifetime for steam turbines, combustion turbines, combined cycle turbines and nuclear power plants, according to Bosi, 2000, p. 29.



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NABCP: the project exploits a by-product from the sugarcane milling process (bagasse) to produce and commercialize renewable electricity connected to a regional Brazilian grid. The methodology is therefore fully applicable to NABCP, and justification for choosing it.



D.2. 1. Option 1: Monitoring of the emissions in the project scenario and the baseline scenario

There is no project emission to be considered in this project activity.

	D.2.1.1. Data to be collected in order to monitor emissions from the project activity, and how this data will be archived:							
ID number (Please use numbers to ease cross- referencing to D.3)	Data variable	Source of data	Data unit	Measured (m), calculated (c) or estimated (e)	Recording frequency	Proportion of data to be monitored	How will the data be archived? (electronic/ paper)	Comment

D.2.1.2. Description of formulae used to estimate project emissions (for each gas, source, formulae/algorithm, emissions units of CO₂ equ.)

Not Applicable

D.2.1.3. Relevant data necessary for determining the <u>baseline</u> of anthropogenic emissions by sources of GHGs within the project boundary and how such data will be collected and archived :

ID number (Please use numbers to ease cross- referencing to table	Data variable	Source of data	Data unit	Measured (m), calculated (c), estimated (e),	Recording frequency	Proportion of data to be monitored	How will the data be archived? (electronic/ paper)	Comment
D.3) 1. EGy	Electricity supplied to the grid by the Project.	Readings of the energy metering connected to the grid and Receipt of Sales.	MWh	M	Monthly	100%	Electronic and paper	Double check by receipt of sales. Will be archived according to internal procedures, until 2 years after the end of the crediting period.

This template shall not be altered. It shall be completed without modifying/adding headings or logo, format or font.

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2. EF _y	CO ₂ emission factor of the Grid.	Calculated	tCO ₂ e/MWh	С	At the validation and yearly after registration	0%	Electronic and paper	Will be archived according to internal procedures, until 2 years after the end of the crediting period.
3. EF _{OM,y}	CO ₂ Operating Margin emission factor of the grid.	Factor calculated from ONS, the Brazilian electricity system manager.	tCO ₂ e/MWh	С	At the validation and yearly after registration	0%	Electronic and paper	Will be archived according to internal procedures, until 2 years after the end of the crediting period.
4. EF _{BM,y}	CO ₂ Build Margin emission factor of the grid.	Factor calculated from ONS, the Brazilian electricity system manager.	tCO ₂ e/MWh	С	At the validation and yearly after registration	0%	Electronic and paper	Will be archived according to internal procedures, until 2 years after the end of the crediting period.
10. λ _y	Fraction of time during which low- cost/ must-run sources are on the margin.	Factor calculated from ONS, the Brazilian electricity system manager.	index	С	At the validation and yearly after registration	0%	Electronic and paper	Will be archived according to internal procedures, until 2 years after the end of the crediting period.

This template shall not be altered. It shall be completed without modifying/adding headings or logo, format or font.



CDM – Executive Board

D.2.1.4. Description of formulae used to estimate baseline emissions (for each gas, source, formulae/algorithm, emissions units of CO₂ equ.)

$EF_{OM,simple_adjusted,y} = (1 - \lambda_y) \frac{\sum_{i,j} F_{i,j,y}.COEF_{i,j}}{\sum GEN_{j,y}} + \lambda_y \frac{\sum_{i,k} F_{i,k,y}.COEF_{i,k}}{\sum GEN_{k,y}} $ (tCO ₂ e/GWh)	$F_{i,j(or\ m),y}$ Is the amount of fuel <i>i</i> (in a mass or volume unit) consumed by relevant power sources <i>j</i> in year(s) <i>y</i>
$EF_{OM,simple_adjusted,y} = (1 - \lambda_y) \frac{dy}{\sum_j GEN_{j,y}} + \lambda_y \frac{dw}{\sum_k GEN_{k,y}} $ (tCO ₂ e/GWh)	<i>j,m</i> Refers to the power sources delivering electricity to the grid, not including low-operating cost and must-run power plants, and including imports4 from the grid
$EF_{BM} = \frac{\sum_{i,m} F_{i,m,y}.COEF_{i,m}}{\sum GEN_{m,y}} (tCO_2e/GWh)$	$COEF_{i,j(or m)}$ s the CO2 emission coefficient of fuel <i>i</i> (tCO2 / mass or volume unit of the fuel), taking intoaccount the carbon content of the fuels used by relevant power sources j (or m) and the percent oxidation of the fuel in year(s) y, a
$\sum_{m} GEN_{m,y} \qquad (CCO_2COVM)$	$GEN_{j(or m),y}$ Is the electricity (MWh) delivered to the grid by source $j(or m)$
	$BE_{electricity,y}$ Are the baseline emissions due to displacement of electricity during the year y in tons of CO ₂
$EF_{electricity} = \frac{EF_{OM} + EF_{BM}}{2}$ (tCO ₂ e/GWh)	EG_y Is the net quantity of electricity generated in the bagasse-based cogeneration plant due to the project activity during the year y in MWh, and
$BE_{electricity,v} = EF_{electricity} \cdot EG_{v}$	$EF_{electricity,y}$ Is the CO ₂ baseline emission factor for the electricity.

D. 2.2. Option 2: Direct monitoring of emission reductions from the project activity (values should be consistent with those in section E).

D.2.2.1. Data to be collected in order to monitor emissions from the project activity, and how this data will be archived:										
ID number (Please use numbers to ease cross- referencing to table D.3)	Data variable	Source of data	Data unit	Measured (m), calculated (c), estimated (e),	Recording frequency	Proportion of data to be monitored	How will the data be archived? (electronic/ paper)	Comment		



D.2.2.2. Description of formulae used to calculate project emissions (for each gas, source, formulae/algorithm, emissions units of CO₂ equ.):

Not Applicable

D.2.3. Treatment of leakage in the monitoring plan

D.2.3.1. If applicable, please describe the data and information that will be collected in order to monitor <u>leakage</u> effects of the

project activity

ID number	Data	Source of	Data	Measured (m),	Recording	Proportion	How will the data	Comment
(Please use numbers to	variable	data	unit	calculated (c)	frequency	of data to	be archived? (electronic/	
				or estimated (e)		be monitored		
ease cross- referencing						monitored	paper)	
to table D.3)								
10 10010 0.5)								
			-					
			1					

D.2.3.2. Description of formulae used to estimate leakage (for each gas, source, formulae/algorithm, emissions units of CO₂ equ.)

Not Applicable

D.2.4. Description of formulae used to estimate emission reductions for the <u>project activity</u> (for each gas, source, formulae/algorithm, emissions units of CO₂ equ.)

$ER_y = BE_{thermal, y} + BE_{electricity, y} - PE_y - L_y$	ER_y : are the emissions reductions of the project activity during the year y in
	tons of CO_2
$BE_{thermal, y} = 0$	BE _{electricity,y} : Are the baseline emissions due to displacement of electricity during
PE _v =0	the year y in tons of CO_2
	BE _{thermal,y} : Are the baseline emissions due to displacement of thermal energy
L _y =0	during the year y in tons of CO_2
$BE_{electricity, y} = EF_{electricity} \cdot EG_{y}$	PE_y : Are the project emissions during the year y in tons of CO_2 .
$DD_{electricity}, y = DT_{electricity} \cdot DOy$	L_y : Are the leakage emissions during the year y in tons of CO ₂ .





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D.3. Quality control (QC) and quality assurance (QA) procedures are being undertaken for data monitored								
Data	Uncertainty level of data	Explain QA/QC procedures planned for these data, or why such procedures are not necessary.						
(Indicate table and	(Indicate table and (High/Medium/Low)							
ID number e.g. 31.;								
3.2.)								
1	Low	These data will be directly used for calculation of emission reductions. Sales record and other records are used to						
		ensure the consistency.						
2	Low	Data does not need to be monitored						
3	Low	Data does not need to be monitored						
4	Low	Data does not need to be monitored						
10	Low	Data does not need to be monitored						

D.4 Please describe the operational and management structure that the project operator will implement in order to monitor emission reductions and any <u>leakage</u> effects, generated by the <u>project activity</u>

The structure for monitoring this project activity will basically consist of registering the amount of energy sold to the grid (EG_y) . There are two operations that the project operators must perform in order to ensure data consistency, despite the fact that this will actually consist of the monitoring of one single variable.

- 1. The monthly readings of the calibrated meter equipment must be recorded in an electronic spreadsheet
- 2. Sales receipt must be archived for double checking the data. In case of inconsistency, these are the data to be used.

Moreover, according to the law, the meter equipment shall be periodically calibrated to comply with the regulations for independent power producers connected to the regional grid.

D.5 Name of person/entity determining the <u>monitoring methodology</u>:

ECONERGY BRASIL (Contact information in Annex 1), which is a participant in this project, is responsible for the technical services related to GHG emission reductions, and is therefore, in behalf of Nova América, the developer of this document, and all its contents.



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SECTION E. Estimation of GHG emissions by sources

E.1. Estimate of GHG emissions by sources:

This project activity does not burn any additional quantity of fossil fuel due to the project implementation. Therefore, the variable PE_y , presented in the methodology, does not need to be monitored.

Thus, $PE_y = 0$

E.2. Estimated <u>leakage</u>:

Nova América did not sell sugarcane bagasse before the implementation of the project.

Thus, $L_y = 0$

E.3. The sum of E.1 and E.2 representing the <u>project activity</u> emissions:

$\mathbf{L}_{\mathbf{y}} + \mathbf{P}\mathbf{E}_{\mathbf{y}} = \mathbf{0}$

E.4. Estimated anthropogenic emissions by sources of greenhouse gases of the <u>baseline:</u>

The baseline methodology considers the determination of the emissions factor for the grid to which the project activity is connected as the core data to be determined in the baseline scenario. In Brazil, there are two main grids, South-Southeast-Midwest and North-Northeast, therefore the South-Southeast-Midwest Grid is the relevant one for this project.

The method that will be chosen to calculate the Operating Margin (OM) for the electricity baseline emission factor is the option (b) *Simple Adjusted OM*, since the preferable choice (c) *Dispatch Data Analysis OM* would face the barrier of data availability in Brazil.

In order to calculate the Operating Margin, daily dispatch data from the Brazilian electricity system manager (ONS) needed to be gathered. ONS does not regularly provide such information, which implied in getting it through communicating directly with the entity.

The provided information comprised years 2002, 2003 and 2004, and is the most recent information available at this stage.

Simple Adjusted Operating Margin Emission Factor Calculation

According to the methodology, the project is to determine the Simple Adjusted OM Emission Factor $(EF_{OM,\ simple\ adjusted,\ y})$. Therefore, the following equation is to be solved:



$$EF_{OM,simple_adjusted,y} = (1 - \lambda_y) \frac{\sum_{i,j} F_{i,j,y}.COEF_{i,j}}{\sum_j GEN_{j,y}} + \lambda_y \frac{\sum_{i,k} F_{i,k,y}.COEF_{i,k}}{\sum_k GEN_{k,y}}$$
(tCO₂e/GWh)

It is assumed here that all the low-cost/must-run plants produce zero net emissions.

$$\frac{\sum_{i,k} F_{i,k,y}.COEF_{i,k}}{\sum_{k} GEN_{k,y}} = 0 \text{ (tCO_2e/GWh)}$$

Please refer to the methodology text or the explanations on the variables mentioned above.

The ONS data as well as the spreadsheet data with the calculation of emission factors have been provided to the validator (DOE). In the spreadsheet, the dispatch data is treated as to allow calculation of the emission factor for the most three recent years with available information, which are 2002, 2003 and 2004.

The Lambda factors were calculated in accordance with methodology requests. More detailed information is provided in Annex 3. The table below presents such factors.

Year	Lambda
2002	0,5053
2003	0,5312
2004	0,5041

Electricity generation for each year needs also to be taken into account. This information is provided in the table below.

Year	Electricity Load (MWh)
2002	275.402.896
2003	288.493.929
2004	297.879.874

Using therefore appropriate information for $F_{i,j,y}$ and $COEF_{i,j}$, OM emission factors for each year can be determined, as follows.

$$EF_{OM,simple_adjusted,2002} = (1 - \lambda_{2001}) \frac{\sum_{i,j} F_{i,j,2002} .COEF_{i,j}}{\sum_{j} GEN_{j,2002}} \therefore EF_{OM,simple_adjusted,2002} = 0,4207 \text{ tCO}_2/\text{MWh}$$
$$EF_{OM,simple_adjusted,2003} = (1 - \lambda_{2003}) \frac{\sum_{i,j} F_{i,j,2003} .COEF_{i,j}}{\sum_{j} GEN_{j,2003}} \therefore EF_{OM,simple_adjusted,2003} = 0,4397 \text{ tCO}_2/\text{MWh}$$



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$$EF_{OM,simple_adjusted,2004} = (1 - \lambda_{2004}) \frac{\sum_{i,j} F_{i,j,2004}.COEF_{i,j}}{\sum_{i} GEN_{j,2004}} \therefore EF_{OM,simple_adjusted,2004} = 0,4327 \text{ tCO}_2/\text{MWh}$$

Finally, to determine the baseline *ex-ante*, the mean average among the three years is calculated, finally determining the $EF_{OM,simple_adjusted}$.

$$EF_{OM,simple_adjusted_{2002}=2004} = 0,4310 \text{ tCO}_2/\text{MWh}$$

According to the methodology used, a Build Margin emission factor also needs to be determined.

$$EF_{BM,y} = \frac{\sum_{i,m} F_{i,m,y}.COEF_{i,m}}{\sum_{m} GEN_{m,y}}$$

Electricity generation in this case means 20% of total generation in the most recent year (2004), as the 5 most recent plants built generate less than such 20%. Calculating such factor one reaches:

$$EF_{BM,2004} = 0,1045 \,\mathrm{tCO}_2/\mathrm{MWh}$$

Finally, the electricity baseline emission factor is calculated through a weighted-average formula, considering both the OM and the BM, being the weights 50% and 50% by default. That gives:

$$EF_{electricity, 2002-2004} = 0.5 * 0.4310 + 0.5 * 0.1045 = 0.2677 \text{ tCO}_2/\text{MWh}$$

It is important to note that adequate considerations on the above weights are currently under study by the Meth Panel, and there is a possibility that such weighing changes in the methodology applied here.

The baseline emissions would be then proportional to the electricity delivered to the grid throughout the project's lifetime. Baseline emissions due to displacement of electricity are calculated by multiplying the electricity baseline emissions factor ($EF_{electricity,2002-2004}$) with the electricity generation of the project activity.

 $BE_{electricity,y} = EF_{electricity,2002-2004}$. EGy

Therefore, for the first crediting period, the baseline emissions will be calculated as follows:

 $BE_{electricity,y} = 0,2677 \text{ tCO}_2/\text{MWh} \cdot \text{EG}_y$ (in tCO₂e)

E.5. Difference between E.4 and E.3 representing the emission reductions of the <u>project</u> <u>activity</u>:

The emissions reduction of this project activity is:

$$\mathbf{ER} = \mathbf{BE}_{\text{electricity,y}} - (\mathbf{L}_{y} + \mathbf{PE}_{y}) = 0,2677 \text{ tCO}_{2}/\text{MWh} \text{ . EG}_{y} - 0 \rightarrow \mathbf{ER} = 0,2677 \text{ tCO}_{2}/\text{MWh} \text{ . EG}_{y}$$



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E.6. Table providing values obtained when applying formulae above:

	Nova América Bagasse Cogeneration Project									
mission	Item	20/5/2001	2002	2003	2004	2005	2006	2007	19/5/2008	Total CERs
ы В Щ	Installed Capacity, MW	22,5	22,5	22,5	22,5	22,5	22,5	22,5	22,5	
nnected Er Reduction	Electric energy to be sold to MAE, MWh/year	40.504	46.170	45.049	41.322	45.000	45.000	45.000	6.429	
8	Baseline emission factor tCO2e/MWh	0,2677	0,2677	0,2677	0,2677	0,2677	0,2677	0,2677	0,2677	
Grid-0	Total CO ₂ emissions reductions, tCO2e/year	10.843	12.360	12.060	11.062	12.047	12.047	12.047	1.721	84.187
	El		بالمحمد الم		Data far	0005 and				

Electricity produced until 2004. Data for 2005 and on are estimates.

Obs: MAE is the Spot Market for Electric Energy.

SECTION F. Environmental impacts

F.1. Documentation on the analysis of the environmental impacts, including transboundary impacts:

The possible environmental impacts were analyzed by the State Secretary of Environment (Secretaria de Estado do Meio Ambiente) through the CETESB (Companhia de Tecnologia de Saneamento Ambiental) department.

Nova América has applied for the installation license. However, the environmental agency did not make any announcement on the requirement, and therefore Nova América had to apply again after almost 2 years without an answer. The environmental agency then required a new Preliminary Environmental Report (RAP) as a way to assess the impacts the project is likely to cause and how the mill proposes mitigation measures. The installation license was emitted in 21st of July, 2004 and the working license was applied in 18th of August, 2004. This stage is still being carried out, with no formal manifestation from the environmental authorities.

F.2. If environmental impacts are considered significant by the project participants or the <u>host</u> <u>Party</u>, please provide conclusions and all references to support documentation of an environmental impact assessment undertaken in accordance with the procedures as required by the <u>host Party</u>:

The impacts from NABCP are not considered significant. They arise from activities (cane crushing and bagasse burning) that were already in place before the project.

The secretary of environment and CETESB already analyzed the most relevant impacts from the project activity. The issuance of the working license attests Nova América's compliance with the environmental legislation and environmental responsibility and it is still being analyzed.

SECTION G. <u>Stakeholders'</u> comments

G.1. Brief description how comments by local <u>stakeholders</u> have been invited and compiled:



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As a requirement of the Brazilian Interministerial Commission on Global Climate Change, the Brazilian DNA, Nova América invited several organizations and institutions to comment the CDM project being developed. Letters¹¹ were sent to the following recipients:

- Prefeitura do Município de Tarumã SP / Municipal Administration of Tarumã SP
- Câmara Municipal dos Vereadores de Tarumã SP / Municipal Legislation Chamber of Tarumã SP
- Ministério Público / Public Ministry
- Fórum Brasileiro de ONGs / Brazilian NGO Forum
- Secretaria da Agricultura, Abastecimento e Meio Ambiente do Município de Tarumã SP / Secretary of Agriculture, Suply and Environment of Tarumã SP
- Companhia de Tecnologia de Saneamento Ambiental do Estado de São Paulo (CETESB) / State Environmental Agency
- Associação dos Agricultores de Água Bonita / Agriculturists Association of Água Bonita

These letters have already been sent, and no replies were received from any of the stakeholders considered.

Previously, Nova América took to the public the initiative of expanding its cogeneration facilities in order to supply electricity to the grid. The company published similar announcements in three newspapers: one regional, one national and the official newspaper of the state of São Paulo. In the announcement, Nova América declared it had required a previous environmental license for the installation of its 16,5 MW turbo-generator and advised the public that the process was open to receive comments within a month from the 8th of January 2002, when the message was published. No reply was gotten. One can assume then that local stakeholders do not disagree with the implementation of the project, once it follows regulatory measures to protect the environment and mitigate any impacts from the project activity.

G.2. Summary of the comments received:

No stakeholder comments were received for NABCP.

G.3. Report on how due account was taken of any comments received:

Since no comments were sent to SMA regarding NABCP, Nova América proceeded with the project as initially planned.

¹¹ The copies of these invitations are available in hold of Project participants.



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Annex 1

CONTACT INFORMATION ON PARTICIPANTS IN THE PROJECT ACTIVITY

1.1 Project Developer Responsible for the CDM Project Activity

Organization:	Econergy Brasil Ltda.
Street/P.O.Box:	Rua Pará, 76 cj 41
Building:	Higienópolis Office Center
City:	São Paulo
State/Region:	SP
Postfix/ZIP:	01243-020
Country:	Brazil
Telephone:	+ 55 (11) 3219-0068
FAX:	+55 (11) 3219-0693
E-Mail:	-
URL:	http://www.econergy.com.br
Represented by:	
Title:	Mr.
Salutation:	
Last Name:	Diniz Junqueira
Middle Name:	Schunn
First Name:	Marcelo
Department:	-
Mobile:	+55 (11) 8263-3017
Direct FAX:	Same above
Direct tel:	+ 55 (11) 3219-0068 ext 25 and/or mobile
Personal E-Mail:	junqueira@econergy.com.br



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1.2 Project Activity Host Company

Organization:	Usina Nova América S/A
Street/P.O.Box:	Bairro Água da Aldeia, s/n
Building:	
City:	Tarumã
State/Region:	SP
Postfix/ZIP:	19820-000
Country:	Brazil
Telephone:	+55 (18) 3373 4000
FAX:	+55 (18) 3373 4100
E-Mail:	
URL:	http://www.novamerica.com.br
Represented by:	
Title:	Mr.
Salutation:	
Last Name:	Avanzi
Middle Name:	
First Name:	Marcelo
Department:	Administration
Mobile:	
Direct FAX:	+55 (18) 3373 4035
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Personal E-Mail:	marcelo@novamerica.com.br

Annex 2

INFORMATION REGARDING PUBLIC FUNDING

No public funding was requested.



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Annex 3

BASELINE INFORMATION

The Brazilian electricity system has been historically divided into two subsystems: the North-Northeast (N-NE) and the South-Southeast-Midwest (S-SE-CO). This is due mainly to the historical evolution of the physical system, which was naturally developed nearby the biggest consuming centers of the country.

The natural evolution of both systems is increasingly showing that integration is to happen in the future. In 1998, the Brazilian government was announcing the first leg of the interconnection line between S-SE-CO and N-NE. With investments of around US\$700 million, the connection had the main purpose, in the government's view, at least, to help solve energy imbalances in the country: the S-SE-CO region could supply the N-NE in case it was necessary and vice-versa.

Nevertheless, even after the interconnection had been established, technical papers still divided the Brazilian system in two (Bosi, 2000)¹²:

- "... where the Brazilian Electricity System is divided into three separate subsystems:
 - (i) The South/Southeast/Midwest Interconnected System;
 - (ii) The North/Northeast Interconnected System; and
 - (iii) The Isolated Systems (which represent 300 locations that are electrically isolated from the interconnected systems)"

Moreover, Bosi (2000) gives a strong argumentation in favor of having so-called *multi-project baselines*:

"For large countries with different circumstances within their borders and different power grids based in these different regions, multi-project baselines in the electricity sector may need to be disaggregated below the country-level in order to provide a credible representation of 'what would have happened otherwise'".

Finally, one has to take into account that even though the systems today are connected, the energy flow between N-NE and S-SE-CO is heavily limited by the transmission lines capacity. Therefore, only a fraction of the total energy generated in both subsystems is sent one way or another. It is natural that this fraction may change its direction and magnitude (up to the transmission line's capacity) depending on the hydrological patterns, climate and other uncontrolled factors. But it is not supposed to represent a significant amount of each subsystem's electricity demand. It has also to be considered that only in 2004 the interconnection between SE and NE was concluded, i.e., if project proponents are to be coherent with the generation database they have available as of the time of the PDD submission for validation, a situation where the electricity flow between the subsystems was even more restricted is to be considered.

The Brazilian electricity system nowadays comprises of around 91,3 GW of installed capacity, in a total of 1.420 electricity generation enterprises. From those, nearly 70% are hydropower plants, around 10% are natural gas-fired power plants, 5,3% are diesel and fuel oil plants, 3,1% are biomass sources (sugarcane bagasse, black liquor, wood, rice straw and biogas), 2% are nuclear plants, 1,4% are coal plants, and there are also 8,1 GW of installed capacity in neighboring countries (Argentina, Uruguay, Venezuela and Paraguay) that may dispatch electricity the Brazilian to grid.

¹² Bosi, M. An Initial View on Methodologies for Emission Baselines: Electricity Generation Case Study. International Energy Agency. Paris, 2000.



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(<u>http://www.aneel.gov.br/aplicacoes/capacidadebrasil/OperacaoCapacidadeBrasil.asp</u>). This latter capacity is in fact comprised by mainly 6,3 GW of the Paraguayan part of *Itaipu Binacional*, a hydropower plant operated by both Brazil and Paraguay, but whose energy almost entirely is sent to the Brazilian grid.

Approved methodologies AM0015 and ACM0002 ask project proponents to account for "all generating sources serving the system". In that way, when applying one of these methodologies, project proponents in Brazil should search for, and research, all power plants serving the Brazilian system.

In fact, information on such generating sources is not publicly available in Brazil. The national dispatch center, ONS – *Operador Nacional do Sistema* – argues that dispatching information is strategic to the power agents and therefore cannot be made available. On the other hand, ANEEL, the electricity agency, provides information on power capacity and other legal matters on the electricity sector, but no dispatch information can be got through this entity.

In that regard, project proponents looked for a plausible solution in order to be able to calculate the emission factor in Brazil in the most accurate way. Since real dispatch data is necessary after all, the ONS was contacted, in order to let participants know until which degree of detail information could be provided. After several months of talks, plants' daily dispatch information was made available for years 2002, 2003 and 2004.

Project proponents, discussing the feasibility of using such data, concluded it was the most proper information to be considered when determining the emission factor for the Brazilian grid. According to ANEEL, in fact, ONS centralized dispatched plants accounted for 75.547 MW of installed capacity by 31/12/2004, out of the total 98.848,5 MW installed in Brazil by the same date (http://www.aneel.gov.br/arquivos/PDF/Resumo Gráficos mai 2005.pdf), which includes capacity available in neighboring countries to export to Brazil and emergency plants, that are dispatched only during times of electricity constraints in the system. Such capacity in fact is constituted by plants with 30 MW installed capacity or above, connected to the system through 138 kV power lines, or at higher voltages. Therefore, even though the emission factor calculation is carried out without considering all generating sources serving the system, about 76.4% of the installed capacity serving Brazil is taken into account, which is a fair amount if one looks at the difficulty in getting dispatch information in Brazil. Moreover, the remaining 23,6% are plants that do not have their dispatch coordinated by ONS, since: either they operate based on power purchase agreements which are not under control of the dispatch authority; or they are located in non-interconnected systems to which ONS has no access. In that way, this portion is not likely to be affected by the CDM projects, and this is another reason for not taking them into account when determining the emission factor.

In an attempt to include all generating sources, project developers considered the option to research for available, but non-official data, to supply the existing gap. The solution found was the International Energy Agency database built when carrying out the study "Road-Testing Baselines For Greenhouse Gas Mitigation Projects in the Electric Power Sector", published in October 2002. Merging ONS data with the IEA data in a spreadsheet, project proponents have been able to consider all generating sources connected to the relevant grids in order to determine the emission factor. The emission factor calculated was found more conservative when considering ONS data only, as the table below shows the build margin in both cases.

IEA/ONS Merged Data Build Margin ONS Data Build Margin



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(tCO ₂ /MWh)	(tCO ₂ /MWh)
0,205	0,1045

Therefore, considering all the rationale explained, project developers decided for the database considering ONS information only, as it was capable of properly addressing the issue of determining the emission factor and doing it in the most conservative way.

The fossil fueled plants efficiencies were also taken from the IEA paper. This was done considering the lack of more detailed information on such efficiencies from public, reliable and credible sources.

From the mentioned reference:

The fossil fuel conversion efficiency (%) for the thermal power plants was calculated based on the installed capacity of each plant and the electricity actually produced. For most of the fossil fuel power plants under construction, a constant value of 30% was used as an estimate for their fossil fuel conversion efficiencies. This assumption was based on data available in the literature and based on the observation of the actual situation of those kinds of plants currently in operation in Brazil. The only 2 natural gas plants in combined cycle (totaling 648 MW) were assumed to have a higher efficiency rate, i.e. 45%.

Therefore only data for plants under construction in 2002 (with operation start in 2002, 2003 and 2004) was estimated. All others efficiencies were calculated. To the best of our knowledge there was no retrofit/modernization of the older fossil-fuelled power plants in the analyzed period (2002 to 2004). For that reason project participants find the application of such numbers to be not only reasonable but the best available option.

The aggregated hourly dispatch data got from ONS was used to determine the lambda factor for each of the years with data available (2002, 2003 and 2004). The Low-cost/Must-run generation was determined as the total generation minus fossil-fuelled thermal plants generation, this one determined through daily dispatch data provided by ONS. All this information has been provided to the validators, and extensively discussed with them, in order to make all points crystal clear.

On the following pages, a summary of the analysis is provided. First, the table with the 130 plants dispatched by the ONS are provided. Then, a table with the summarized conclusions of the analysis, with the emission factor calculation displayed. Finally, the load duration curves for the S-SE-MW system are presented.



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ONS Dispatched Plants

Λ	Subsystem*	Fuel source**	Power plant	Operation start [2, 4, 5]	Installed capacity (MW) [1]	Fossil fuel conversion	Carbon emission factor (tC/TJ) [3]	Fraction carbon oxidized [3]	Emission factor (tCO2/MWh)
1	S-SE-CO	н	Jauru	Sep-2003	121.5	efficiency (%) [2] 1	0.0	0.0%	0.000
2	S-SE-CO S-SE-CO	HG	Gauporé Três Lagoas	Sep-2003 Aug-2003	120.0 306.0	1	0.0	0.0%	0.000
4	S-SE-CO S-SE-CO	н	Funil (MG) Itiquira I	Jan-2003 Sep-2002	180.0	1	0.0	0.0%	0.000
6	S-SE-CO	G	Araucária	Sep-2002	484.5	0.3	15.3	99.5%	0.670
7	S-SE-CO S-SE-CO	G H	Cancas Piraju	Sep-2002 Sep-2002	160.6 81.0	0.3	15.3	99.5% 0.0%	0.670
9 10	S-SE-CO S-SE-CO	GO	Nova Piratininga PCT CGTEE	Jun-2002 Jun-2002	384.9 5.0	0.3	15.3 20.7	99.5% 99.0%	0.670
11	S-SE-CO S-SE-CO	H	Rosal Ibirité	Jun-2002 May-2002	55.0 226.0	1	0.0	0.0%	0.000
13	S-SE-CO	H	Cana Brava	May-2002	465.9	1	0.0	0.0%	0.000
14 15	S-SE-CO S-SE-CO	Н	Sta. Clara Machadinho	Jan-2002 Jan-2002	60.0 1,140.0	1	0.0	0.0%	0.000
16	S-SE-CO S-SE-CO	G	Juiz de Fora Macaé Merchant	Nov-2001 Nov-2001	87.0 922.6	0.28	15.3 15.3	99.5% 99.5%	0.718
18 19	S-SE-CO S-SE-CO	H	Lajeado (ANEEL res. 402/2001) Eletrobolt	Nov-2001 Oct-2001	902.5 379.0	1	0.0	0.0%	0.000
20	S-SE-CO	н	Porto Estrela	Sep-2001	112.0	1	0.0	0.0%	0.000
21 22	S-SE-CO S-SE-CO	G	Cuiaba (Mario Covas) W. Arjona	Aug-2001 Jan-2001	529.2 194.0	0.3	15.3 15.3	99.5% 99.5%	0.670
23 24	S-SE-CO S-SE-CO	G H	Uruguaiana S. Caxias	Jan-2000 Jan-1999	639.9 1,240.0	0.45	15.3	99.5%	0.447
25 26	S-SE-CO S-SE-CO	н	Canoas I Canoas II	Jan-1999 Jan-1999	82.5 72.0	1	0.0	0.0%	0.000
27	S-SE-CO	н	Igarapava	Jan-1999 Jan-1999	210.0	1	0.0	0.0%	0.000
29	S-SE-CO S-SE-CO	D	Porto Primavera Cuiaba (Mario Covas)	Oct-1998	1,540.0 529.2	0.27	0.0 20.2	99.0%	0.000
30	S-SE-CO S-SE-CO	H	Sobragi PCH EMAE	Sep-1998 Jan-1998	60.0 26.0	1	0.0	0.0%	0.000
32 33	S-SE-CO S-SE-CO	н	PCH CEEE PCH ENERSUL	Jan-1998 Jan-1998	25.0 43.0	1	0.0	0.0%	0.000
34	S-SE-CO S-SE-CO	н	PCH CEB PCH ESCELSA	Jan-1998 Jan-1998	15.0	1	0.0	0.0%	0.000
36	S-SE-CO	н	PCH CELESC	Jan-1998	50.0	1	0.0	0.0%	0.000
37 38	S-SE-CO S-SE-CO	H	PCH CEMAT PCH CELG	Jan-1998 Jan-1998	145.0 15.0	1	0.0	0.0%	0.000
39 40	S-SE-CO S-SE-CO	н	PCH CERJ PCH COPEL	Jan-1998 Jan-1998	59.0 70.0	1	0.0	0.0%	0.000
41	S-SE-CO	н	PCH CEMIG	Jan-1998	84.0	1	0.0	0.0%	0.000
42	S-SE-CO S-SE-CO	H	PCH CPFL S. Mesa	Jan-1998 Jan-1998	55.0 1,275.0	1	0.0	0.0%	0.000
44 45	S-SE-CO S-SE-CO	н	PCH EPAULO Guilmam Amorim	Jan-1998 Jan-1997	26.0 140.0	1	0.0	0.0%	0.000
46	S-SE-CO S-SE-CO	н	Corumbá Miranda	Jan-1997 Jan-1997	375.0 408.0	1	0.0	0.0%	0.000
48	S-SE-CO S-SE-CO S-SE-CO	н	Noav Ponte Segredo (Gov. Ney Braga)	Jan-1997 Jan-1994 Jan-1992	408.0 510.0 1,260.0	1	0.0	0.0%	0.000
50	S-SE-CO	н	Taquaruçu	Jan-1989	554.0	1	0.0	0.0%	0.000
51 52	S-SE-CO S-SE-CO	н	Manso D. Francisca	Jan-1988 Jan-1987	210.0 125.0	1	0.0	0.0%	0.000
53 54	S-SE-CO S-SE-CO	н	Itá Rosana	Jan-1987 Jan-1987	1,450.0 369.2	1	0.0	0.0%	0.000
55	S-SE-CO S-SE-CO	N	Angra T. Irmãos	Jan-1985 Jan-1985	1,874.0 807.5	1	0.0	0.0%	0.000
57	S-SE-CO	н	Itaipu 60 Hz	Jan-1983	6,300.0	1	0.0	0.0%	0.000
58 59	S-SE-CO S-SE-CO	H	Itaipu 50 Hz Emborcação	Jan-1983 Jan-1982	5,375.0	1	0.0	0.0%	0.000
60 61	S-SE-CO S-SE-CO	н	Nova Avanhandava Gov. Bento Munhoz - GBM	Jan-1982 Jan-1980	347.4 1.676.0	1	0.0	0.0%	0.000
62	S-SE-CO	Н	S.Santiago	Jan-1980	1,420.0 2,280.0	1	0.0	0.0%	0.000
63 64	S-SE-CO S-SE-CO	H O	ltumbiara Igarapé	Jan-1980 Jan-1978	2,280.0	1	0.0 20.7	0.0%	0.000
65 66	S-SE-CO S-SE-CO	н	Itauba A. Vermelha (Jose E. Moraes)	Jan-1978 Jan-1978	512.4 1,396.2	1	0.0	0.0%	0.000
67 68	S-SE-CO S-SE-CO	н	S.Simão Capivara	Jan-1978 Jan-1977	1,710.0 640.0	1	0.0	0.0%	0.000
69	S-SE-CO	н	S.Osório	Jan-1975	1,078.0	1	0.0	0.0%	0.000
70 71	S-SE-CO S-SE-CO	н	Marimbondo Promissão	Jan-1975 Jan-1975	1,440.0 264.0	1	0.0	0.0%	0.000
72 73	S-SE-CO S-SE-CO	C H	Pres. Medici Volta Grande	Jan-1974 Jan-1974	446.0 380.0	0.26	26.0 0.0	98.0% 0.0%	1.294
74	S-SE-CO	н	Porto Colombia	Jun-1973	320.0	1	0.0	0.0%	0.000
75 76	S-SE-CO S-SE-CO	H	Passo Fundo Passo Real	Jan-1973 Jan-1973	220.0 158.0	1	0.0	0.0%	0.000
77 78	S-SE-CO S-SE-CO	H	Iha Solteira Mascarenhas	Jan-1973 Jan-1973	3,444.0 131.0	1	0.0	0.0%	0.000
79 80	S-SE-CO S-SE-CO	H	Gov. Parigot de Souza - GPS Chavantes	Jan-1971 Jan-1971	252.0 414.0	1	0.0	0.0%	0.000
81	S-SE-CO	Н	Jaguara	Jan-1971	424.0	1	0.0	0.0%	0.000
82 83	S-SE-CO S-SE-CO	H	Sá Carvalho Estreito (Luiz Carlos Barreto)	Apr-1970 Jan-1969	78.0	1	0.0	0.0%	0.000
84 85	S-SE-CO S-SE-CO	н	Ibitinga Jupiá	Jan-1969 Jan-1969	131.5 1,551.2	1	0.0	0.0%	0.000
86 87	S-SE-CO S-SE-CO	O G	Alegrete Campos (Roberto Silveira)	Jan-1968 Jan-1968	66.0 30.0	0.26	20.7 15.3	99.0% 99.5%	1.040
88	S-SE-CO	G	Santa Cruz (RJ)	Jan-1968	766.0	0.31	15.3	99.5%	0.648
89 90	S-SE-CO S-SE-CO	н	Paraibuna Limoeiro (Armando Salles de Oliviera)	Jan-1968 Jan-1967	85.0 32.0	1	0.0	0.0%	0.000
91 92	S-SE-CO S-SE-CO	H C	Caconde J.Lacerda C	Jan-1966 Jan-1965	80.4 363.0	0.25	0.0 26.0	0.0%	0.000
93 94	S-SE-CO	C	J.Lacerda B	Jan-1965	262.0	0.21	26.0	98.0%	1.602
95	S-SE-CO S-SE-CO	C H	J.Lacerda A Bariri (Alvaro de Souza Lina)	Jan-1965 Jan-1965	232.0 143.1	1	26.0 0.0	98.0% 0.0%	1.869
96 97	S-SE-CO S-SE-CO	H C	Funil (RJ) Figueira	Jan-1965 Jan-1963	216.0 20.0	0.3	0.0 26.0	0.0%	0.000
98 99	S-SE-CO S-SE-CO	н	Fumas Barra Bonita	Jan-1963 Jan-1963	1,216.0 140.8	1	0.0	0.0%	0.000
00	S-SE-CO S-SE-CO	С	Charqueadas Jurumirim (Armando A. Laydner)	Jan-1962 Jan-1962	72.0	0.23	26.0 0.0	98.0%	1.462
02	S-SE-CO	н	Jacui	Jan-1962	180.0	1	0.0	0.0%	0.000
03	S-SE-CO S-SE-CO	H	Pereira Passos Tres Marias	Jan-1962 Jan-1962	99.1 396.0	1	0.0	0.0%	0.000
05 06	S-SE-CO S-SE-CO	H	Euclides da Cunha Camargos	Jan-1960 Jan-1960	108.8 46.0	1	0.0	0.0%	0.000
07	S-SE-CO S-SE-CO	н	Santa Branca Cachoeira Dourada	Jan-1960 Jan-1959	56.1 658.0	1	0.0	0.0%	0.000
09	S-SE-CO	н	Salto Grande (Lucas N. Garcez)	Jan-1958	70.0	1	0.0	0.0%	0.000
10 11	S-SE-CO S-SE-CO	H	Salto Grande (MG) Mascarenhas de Moraes (Peixoto)	Jan-1956 Jan-1956	102.0 478.0	1	0.0	0.0%	0.000
12 13	S-SE-CO S-SE-CO	H C	Itutinga S. Jerônimo	Jan-1955 Jan-1954	52.0 20.0	1 0.26	0.0 26.0	0.0%	0.000
14 15	S-SE-CO S-SE-CO	0	Carioba Piratininga	Jan-1954 Jan-1954	36.2 472.0	0.3	20.7	99.0% 99.0%	0.902
16	S-SE-CO	н	Canastra	Jan-1953	42.5	1	0.0	0.0%	0.000
17 18	S-SE-CO S-SE-CO	H	Nilo Peçanha Fontes Nova	Jan-1953 Jan-1940	378.4 130.3	1	0.0	0.0%	0.000
19 20	S-SE-CO S-SE-CO	н	Henry Borden Sub. Henry Borden Ext.	Jan-1926 Jan-1926	420.0 469.0	1	0.0	0.0%	0.000
21	S-SE-CO S-SE-CO	Н	I. Pombos	Jan-1924 Jan-1917	189.7	1	0.0	0.0%	0.000
22	3-3E-UU	н	Jaguari	Jan-1917 Total (MW) =		1	0.0	0.0%	0.000
		CO - Southeast-Midw							
	A oência Nacional de E	Energia Elétrica. Banco	natural gas; H, hydro; N, nuclear; O, residual de Informações da Geração (http://w.w.a	neel.cov.br/, data colle	ted in november 2004)				
1] /				mine (Read textile a base	allows for CUIC mitlant	on projects in the elec-	this second sector OFC	DIFA information page	v October 2002
2	Bosi, M., A. Laurence,	P. Maidonado, R. Scha nel on Climate Change.	effer, A.F. Simoes, H. Winkler and J.M. Luka Revised 1996 Guidelines for National Gree	nhouse Gas Inventori	ennes for GPIG magai IS.	on projecta in the end	and power suctor. OBC		CONCERNING LOCAL



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Summary table

Emission factors for the Brazilian South-Southeast-Midwest interconnected grid									
Baseline (including imports)	EF OM [tCO2/MWh]	Load [MWh]	LCMR [GWh]	Imports [MWh]					
2002	0,8504	275.402.896	258.720	1.607.395					
2003	0,9378	288.493.929	274.649	459.586					
2004	0,8726	297.879.874	284.748	1.468.275					
	Total (2001-2003) =	861.776.699	818.118	3.535.256					
	EF OM, simple-adjusted [tCO2/MWh]	EF BM,2004	Lambda						
	0,4310	0,1045	$\lambda_{2\ell}$	02					
	Alternative weights	Default weights	0,50)53					
	$w_{OM} = 0,75$	$w_{OM} = 0,5$	λ_{20}	003					
	$W_{BM} = 0,25$	$W_{BM} = 0,5$	0,5312						
	EF CM [tCO2/MWh]	Default EF OM [tCO2/MWh]	$\lambda_{2\ell}$	004					
	0,3494	0,2677	0,50	041					

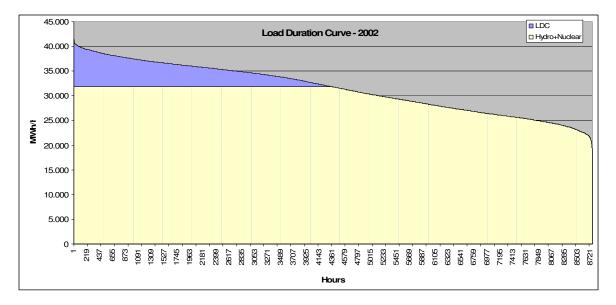


Figure 4. Load duration curve for the S-SE-MW system, 2002



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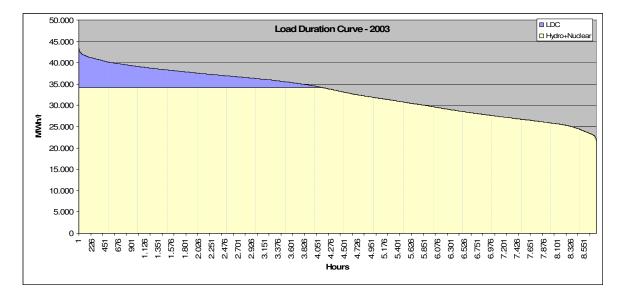


Figure 5. Load duration curve for the S-SE-MW system, 2003

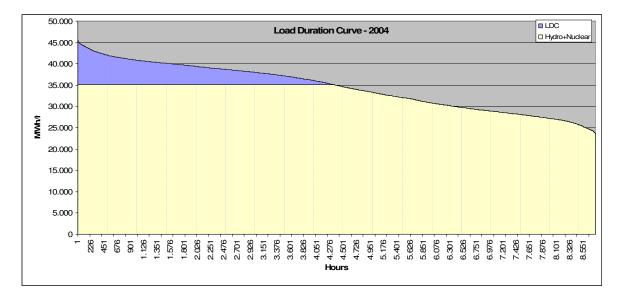


Figure 6. Load duration curve for the S-SE-MW system, 2004



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Annex 4

MONITORING PLAN

According to the section D of this document, the only variable that will be monitored in this project activity is the quantity of energy exported to the grid, from year 2001 up to the end of the last crediting period. Since no leakage nor any off-grid emissions change were identified in this project activity, there will be no need to monitor the variables for these cases. The monitoring will occur as follows:

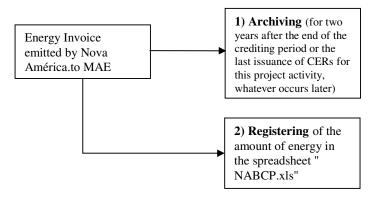


Figure 7: Monitoring procedures for Nova América

The quantity of energy exported to the grid will be monitored through the energy invoice emitted by Nova América to MAE, the energy distributor. The archiving will occur up to two years after the end of the crediting period or the last issuance of CERs for this project activity, whatever occurs later. The amount of energy will be registered in the spreadsheet "NABCP.xls", which shall be the instrument for the further Verification.