



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

CONTENTS

- A. General description of project activity
- B. Application of a baseline methodology
- C. Duration of the project activity / Crediting period
- D. Application of a monitoring methodology and plan
- E. Estimation of GHG emissions by sources
- F. Environmental impacts
- G. Stakeholders' comments

Annexes

- Annex 1: Contact information on participants in the project activity
- Annex 2: Information regarding public funding
- Annex 3: Baseline information
- Annex 4: Monitoring plan

**SECTION A. General description of project activity****A.1. Title of the project activity**

Bioenergia Cogeneradora (“Bioenergia”), correspondig to the Santo Antonio Mill (USA – from the Portuguese “Usina Santo Antônio”) and the São Francisco mill (USFR – from the Portuguese “Usina São Francisco”)

PDD version number: 11

Date: October 14, 2005

A.2. Description of the project activity

The Santo Antonio Mill (USA – from the Portuguese “Usina Santo Antônio”) and the São Francisco mill (USFR – from the Portuguese “Usina São Francisco”) are sugarcane mills located in Sertãozinho, São Paulo, Brazil. The history of the owner of these two mills begins in 1946, with the foundation of the Balbo Group. The landmark of the group activities was the implementation of the Santo Antonio plant in the city of Sertãozinho in the State of São Paulo. In its first harvest in 1947, USA produced 1,383 tonnes of sugar (23,046 60-kilo sacks). In 1957, Balbo Group purchased another company in Sertãozinho: the São Francisco Sugar Mill. In the first harvest in 1957, 7,375 tonnes of sugar (122,913 60-kilo sacks) were produced in USFR. Continuing the growing process in 1962 and 1965, respectively, the Santana plants in Sertãozinho and Perdigoão in Ribeirão Preto were purchased and incorporated into the Santo Antonio Plant. It should be mentioned that all the facilities of the Balbo Group are fully owed by the Balbo family.

Another interesting point is that Agropecuaria Tambori and around 300 other autonomous producers supply all the sugarcane utilized by the plants. The Santo Antonio and the São Francisco mills, in terms of energy, are self-sufficient for more than 14 years, in other words: they consume energy that is produced by sugarcane bagasse generated in their own units.

The plants of the Balbo Group have been maintaining a pioneer posture in several aspects. In 1999 the group implemented the Plan of Participation in Results (PPR). This plan consists of the establishment of goals to be achieved in terms of diligence and security. Those objectives were based upon historical coefficients, in order to guarantee their execution. Besides the pioneer posture adopted in the employee-employer relationship, the Balbo Group was also a pioneer in an industrial-scale production of organic-sugar in Brazil. The organic sugar of the Balbo Group – the ‘Native’ - was a result of a project that required investments of US\$6 million.

As it was shown above, during its history the Balbo Group has invested in its growth and improvement. As a result, the Group managed to increase its production, processing 3.000.000 tonnes of sugarcane and producing 250,000 tonnes of sugar and 150,000 m³ of alcohol in the 2001/2002 season.

It should be mentioned that the “Bioenergia Cogeneradora” is a special purpose company (SPC) set up to use residues from sugarcane milling in the city of Sertãozinho to generate electricity in a power plant using a high pressure boiler (63 bar) coupled with a new 24 MW generator (Figure 1). For the expected electric energy output (around 78,000, assuming 90% capacity factor) there is a Power Purchase Agreement (PPA) signed in October 2001 with the local power utility (CPFL, Companhia Paulista de Força e Luz) valid until 31/Dec/2013, which is available upon request.

**CDM – Executive Board**

A more efficient cogeneration of this renewable fuel allows Bioenergia to sell a surplus of electricity to the grid and creates a competitive advantage. The electricity sold to the grid diversifies income to the mill and it helps meet Brazil's rising demand for energy due to economic growth and to improve the supply of electricity, while contributing to the environmental, social and economic sustainability by increasing renewable energy's share of the total Brazilian (and the Latin America and the Caribbean region's) electricity consumption.

This indigenous and cleaner source of electricity will also have an important contribution to environmental sustainability by reducing carbon dioxide emissions that would have occurred otherwise in the absence of the project. The project activity reduces emissions of greenhouse gas (GHG) by avoiding electricity generation by fossil fuel sources (and CO₂ emissions), which would be generating (and emitting) in the absence of the project.

This type of project typically does not incur large expenditures nor require significant employment demand. The project employed one hundred and twenty one workers during the construction of the bagasse thermo facility and it annually employs sixty-five workers to operate the plant. However, it contributes to the larger social welfare of the region; the entire project activity complex, including both sugar mills, currently and directly employees 2,500 workers, which represent more than 5% of Sertãozinho's population.

Income distribution will be derived from this project due to job creation, employees' salaries and package of benefits such as social security and life insurance, and credits of emission reductions. Additionally, lower expenditure is achieved due to the fact that money will no longer be spent in the same amount to "import" electricity from other regions in the country through the grid. This money would stay in the region and be used for providing the population better services which would improve the availability of basic needs. This surplus of capital could be translated in investments in education and health that would directly benefit the local population and indirectly in a more equitable income distribution.

A.3. Project participants**Credit Owner and Project Operator:**

Name of Party involved (*) ((host) indicates a host Party)	Private and/or public entity(ies) project participants (*) (as applicable)	Kindly indicate if the Party involved wishes to be considered as project participant (Yes/No)
Brazil (host)	Bioenergia Cogeradora (Private Entity)	No
(*) In accordance with the CDM modalities and procedures, at the time of making the CDM-PDD public at the stage of validation, a Party involved may or may not have provided its approval. At the time of requesting registration, the approval by the Party(ies) involved is required.		

Table 1 – Party(ies) and private/public entities involved in the activity

Please refer to Annex 1 for detailed contact information.

A.4. Technical description of the project activity

**A.4.1. Location of the project activity****A.4.1.1. Host Party(ies)**

Brazil

A.4.1.2. Region/State/Province etc.

Southeast Region/ State of São Paulo

A.4.1.3. City/Town/Community etc

Sertãozinho

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

Sertãozinho is a town of 103,000 inhabitants in the State of São Paulo. It is located in one of the main agricultural heartlands of the country (Figure 2). The sugarcane mill (Figure 3) is located near Ribeirão Preto, which is the major city of the north-eastern part of the state. Ribeirão Preto is an important road and rail hub which makes it an important distribution center for a large coffee growing and livestock-breeding area. Cotton, sugarcane, and grains are cultivated near the city, which is at the center of a region that produces 70 percent of the nation's orange juice and is considered Brazil's largest sugarcane planter and sugar and alcohol producer. In this region there are more than 40 mills, responsible for about 25% of the national production of sugarcane, sugar and alcohol. Additionally, there are a number of related industries and supply companies.

A.4.2. Category(ies) of project activity

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

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

Biomass power conversion technologies for electricity production can be broadly categorized as one of three technologies: direct combustion technology, gasification technology, and pyrolysis. Direct combustion technology, like the one used in São Francisco and Santo Antônio mills, is the most widely used for simultaneous power generation and heat production from biomass. It involves the oxidation of biomass with excess air in a process that yields hot flue gases that are used to produce steam in boilers. The steam is used to produce electricity in a Rankine cycle engine. The Rankine cycle is a heat engine with a vapor power cycle, as can be seen in Figure 4. The working fluid is water. Typically, electricity is



produced in a “condensing” steam cycle, while electricity and steam are co-generated in an “extracting” steam cycle.

São Francisco Mill operates with a configuration using two high-pressure boilers and a multiple stage backpressure turbine coupled with two 6MW generators. Santo Antônio Mill operates with a configuration using 3 high-pressure boilers and a multiple stage backpressure turbine coupled with a new 24MW generator. The two mills produce together a 19.3MW power surplus, operating at full capacity during the season (May to November). The local power utility (CPFL, “Companhia Paulista de Força e Luz”) has signed a Power Purchase Agreement (PPA, valid until 2013) with Bioenergia Cogeneradora.

The Bioenergia Project (Figure 5) uses the following equipments in each mill:

- USA: 3 high-pressure boilers (254 tonnes of steam per hour capacity) coupled with a 24 MW turbo-generator.
- USFR: 2 high-pressure boilers (154 tonnes of steam per hour capacity) coupled with two 6MW turbo-generators.
- Sub-station: 13.8 – 138kV
- Transmission Line: 138kV
- Chiller: 300 m³/h

Situation WITHOUT the Project	Plant	USA	UFRA	Consolidated
Boilers				
- Quantity	Un.	3	2	5
- Production Capacity	t/h	250	150	400
- Generators				
- Quantity	Un.	2	1	3
- Production Capacity	kWh/h	6,600	3,300	9,900
- (Own Consumption)	kWh/h	6,600	3,000	9,600
- Stand-by	kWh/h	0	300	0
- Surplus for Sale	kWh/h	0	300	300
Situation WITH the Project	Plant	USA	UFRA	Consolidated
- Boilers				
- Quantity	Un.	3	2	5
- Production Capacity	t/h	254	154	408
- Generators				
- Quantity	Un.	1	2	3
- Production Capacity	kWh/h	24,000	6,140	30,140
- (Own Consumption)	kWh/h	7,200	3,640	10,840
- Stand-by	kWh/h	0	0	0
- Surplus for Sale	kWh/h	16,800	2,500	19,300

In 2002, USA bought a 62 kgf/cm² new boiler, and kept two boilers and shut down a 21 kgf/cm² one. UFRA kept its two 21 Kg/cm² boilers.

In 2002, USA bought a new turbo generator, transferred one to UFRA and shut down another. UFRA kept its one and started using the one transferred from USA.



Compare previous and current USA situation (Figure 6 and Figure 7) and previous and current UFRA situation (Figure 8 and Figure 9).

Old components were shut down however they can still work. They were left to work as back ups and eventually they can be negotiated.

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 project activity, including why the emission reductions would not occur in the absence of the proposed project activity, taking into account national and/or sector policies and circumstances

Bioenergia project, a greenhouse (GHG) gas-free power generation project, will result in GHG emissions reductions as the result of the displacement of generation from fossil-fuel thermal plants that would have otherwise been delivered to the interconnected grid.

As Kartha et al. (2002) stated, “The crux of the baseline challenge for electricity projects clearly resides in determining the ‘avoided generation’, or what would have happened without the CDM or other GHG-mitigation project. The fundamental question is whether the avoided generation is on the ‘build margin’ (i.e. replacing a facility that would have otherwise been built) and/or ‘operating margin’ (i.e. affecting the operation of current and/or future power plants).”

The baseline emission factor is calculated as a combined margin consisting of the combination of operating margin and build margin factors. For the purpose of determining the build margin and the operating margin emission factors, a project electricity system is defined by the spatial extent of the power plants that can be dispatched without significant transmission constraints. Similarly a connected electricity system is defined as one which is connected by transmission lines to the project electricity system and in which power plants can dispatch without significant transmission constraints.

A.4.4.1. Estimated amount of emission reductions over the chosen crediting period

Table 2 – Estimated emission reductions over the chosen crediting period



CDM – Executive Board

Years	Annual estimation of emission reductions in tonnes of CO _{2e}
Total 2002*	14,471
Total 2003	18,895
Total 2004	20,370
Total 2005	21,913
Total 2006	21,913
Total 2007	21,913
Total 2008	21,913
Total 2009**	10,266
Total estimated reductions (tonnes of CO_{2e})	151,655
Total number of crediting years	7
Annual average over the crediting period of estimated reductions (tonnes of CO_{2e})	21,665

* Since June 21st, 2002

** Until June 20th 2009

The approved consolidated baseline methodology AM0015 – “Bagasse-based cogeneration connected to an electricity grid”, applies to electricity capacity additions from Bagasse-based cogeneration Facility, which is the proposed project activity. The baseline scenario considers the electricity, which would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources.

With a baseline of 278.3 kgCO₂-eq./MWh, the implementation of the Bioenergia Cogeneration project connected to the Brazilian interconnected power grid will generate an estimated average annual reduction of 21,665 tCO₂ equivalent, and a total reduction of 151,655 tCO₂ equivalent over the first 7-year period. See Table 2.

A.4.5. Public funding of the project activity

There is no public funding involved for this Project.

Applicati

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 project activity

The chosen methodology provides a procedures / conditions to determine if the referred methodology is applicable to the Bioenergia project activity.

The bagasse to be used as the feedstock for cogeneration shall be supplied from the same facility where the project is implemented;

The Bioenergia project is installed inside the Santo Antônio and the São Francisco sugarcane mills. The sugar mills retrofitted the power plant in order to generate excess electricity to export to the grid using the same quantity of bagasse as before the retrofitting entirely supplied by the sugarcane mills.



Documentation is available supporting the project activity would not be implemented by the public sector, project participants or other relevant potential developers, notwithstanding of the government policies/ programs to promote renewables if any, in the absence of the CDM;

The project is located within the Santo Antônio and the São Francisco sugar mills premises using the bagasse produced from the sugarcane milling process; therefore, no other entity could develop this project. The government does not control sugar mills in Brazil; therefore projects such as the Bioenergia Project could only be set up by the private sector.

The implementation of the project shall not increase the bagasse production in the facility;

The Santo Antônio and the São Francisco sugar mills have not experienced any physical additional expansions since the project activity was implemented. They produce the same amount of sugarcane and bagasse as before the project activity was implemented. The fluctuation of the amount of sugarcane produced and, consequently the bagasse is due to climate, crop and market conditions that could vary from year to year. Additionally, the percentage of fibre present in the sugarcane could influence in the amount of bagasse. See Table 3 for verifying the volume of sugarcane and bagasse generated at the Santo Antônio and the São Francisco sugar mills in the recent years. As can be seen the fluctuation of sugarcane production and fibre is minimal. *The bagasse at the project facility should not be stored for more than one year.*

The sugar mills, generally, store a small amount of bagasse for the next season in order to start plant operations when the new crop season/ harvest begins. The bagasse is stored from the end of the harvest season in November in the South/Southeast region, until the beginning of the following harvest season in May. The volume of bagasse stored between seasons is insignificant, less than 5% of the total amount of bagasse generated during the year or during the harvest period.

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

The *Bioenergia Cogeneration Project* is a cogeneration project connected to the electricity grid. The project fulfils all the “additionality” requisites (see application of the “additionality tool¹” below) and demonstrates why the project would not occur in the absence of the CDM.

During a period of restructuring the entire electricity market, as is the current Brazilian situation, investment uncertainty is the main barrier for small renewable energy power projects. In this scenario these projects compete with existing plants (operating margin) and with new projects (build margin), which usually attract the attention of financial investors. Operating and Build Margins have been used to calculate the emission factor for the connected grid.

The methodology AM-0015, for cogeneration projects, uses derived margins, which have been applied in the context of the project activity through the determination of the emissions factor for the South-Southeast-Midwest subsystem of the interconnected Brazilian grid (electricity system that is connected by transmission lines to the project electricity system and in which power plants can be dispatched without significant transmission constraints).

¹ Tool for the demonstration and assessment of additionality. UNFCCC, CDM Executive Board 16th Meeting Report, 22 October 2004, Annex 1. Web-site: <http://cdm.unfccc.int/>



Years	Total installed capacity (MW)	Installed Capacity (MW) own use	Installed Capacity (MW) to export to the grid	Capacity Factor %	Hours of operation during the year	MWh year exported to the grid
Year 1_2002	31	11	20	90%	2,860	51,999
Year 2_2003	31	11	20	90%	3,734	67,893
Year 3_2004	31	11	20	90%	4,026	73,193
Year 4_2005	31	11	20	90%	4,331	78,740
Year 5_2006	31	11	20	90%	4,331	78,740
Year 6_2007	31	11	20	90%	4,331	78,740
Year 7_2008	31	11	20	90%	4,331	78,740
Year 8_2009	31	11	20	90%	2,166	39,371

Table 4 – Project's installed capacity

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 project activity

The proposed baseline methodology includes an Additionality Tool approved by the Executive Board. This tool considers some important steps that are necessary in order to determine if the project activity is additional and also demonstrates the importance that emissions reductions would not occur in the absence of the *Bioenergia Cogeneration* project activity.

Following are the steps necessary for the demonstrations and assessment of *Bioenergia Cogeneration* project additionality:

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

a) Project Start date: UTE Usina Santo Antonio "USA" project started in 21/06/2002. UTE Usina São Francisco "UFRA" project started in 18/08/2002.

b) Evidence demonstrates that CDM incentives were seriously considered in the development of the project activity.

The sugar and ethanol mills located in the state of São Paulo are allied in a strong association that allows them to be represented as a single entity, strengthening their dialogue with the government and the market. UNICA - the São Paulo Sugarcane Agroindustry Union was created in 1997 combining into a single entity two existing unions in this sector: SIAESP² (sugar industry) and SIFAESP³ (ethanol industry).

UNICA has been proactive in providing its associates with a great amount of information about different issues, including CDM and its opportunities. Since 1997 this entity has provided seminars, books and research papers in order to inform and advise the sugar mills on procedures, incentives and opportunities regarding CDM.

São Francisco and Santo Antônio mills, being an associate of UNICA, has been exposed to CDM in several forums and activities promoted by the entity. All of the information obtained was extremely important in the decision to proceed with the project activity and eventually to initiate the *Bioenergia Cogeneration* project.

² SIAESP – Sindicato da Industria do Açúcar do Estado de São Paulo. The Syndicate of Sugar Industry on the State of São Paulo.

³ SIFAESP – Sindicato da Industria da Fabricação do Alcool no Estado de São Paulo. The Syndicate of the Alcohol Production Industry of the State of São Paulo.



Both mills are also members of Copersucar - a Cooperative of 32 sugar and ethanol producers. In addition to being the biggest sugar and ethanol producer in the world, Copersucar is the owner of CTC - Copersucar Technology Center, its technology arm. The Center is one of the most advanced research and development centres for sugar cane production and processing and has developed numerous research papers to instruct its partners regarding the CDM.

Below are some activities developed by UNICA, Copersucar/CTC and other sector participants that provide evidence of the intention to maintain their associates informed about CDM:

- “Alcool e Aquecimento Global”, 1997. (CNI, Copersucar and COPPE-UFRJ). Alcohol and Global Warming. This book was financed by Copersucar to make partners aware about Global Warming and how ethanol might contribute to its mitigation. Balbo is also part of Copersucar.
- “O álcool combustível e o desenvolvimento sustentado”, 1998. (João Guilherme Sabino Ometto, sugar producer and former president of SIAESP, SIFAESP and Copersucar). Fuel Alcohol and Sustainable Development. This book was developed to inform the sector about the opportunities of using alcohol in the CDM scenario. This book is based on the Kyoto Protocol prerogatives.
- UNICA⁴ is founder member of the IETA⁵ – International Emissions Trading Association (1998). The objective of the association is to develop an active, global greenhouse gas market, consistent across national boundaries and involving all flexibility mechanisms: the Clean Development Mechanism, Joint Implementation and emissions trading.
- BRAZIL/U.S. ASPEN GLOBAL FORUM. *University of Colorado at Denver*. Copersucar participated in the following documents regarding Climate Change:
 - Early Start Carbon Emission Reduction Projects. Challenge & Opportunity, 1999
 - Task Forces on Early Start Projects for Carbon Emissions Reductions, 2000
- “O Ciclo da Cana-de-Açúcar e Reduções Adicionais nas Emissões de CO₂”, 2000. (Isaías de Carvalho Macedo, CTC – Copersucar). The Sugarcane Cycle and the Additional CO₂ Emission Reductions. Research paper prepared to inform the partners of Copersucar.
- “Sugar cane residues for power generation in the sugar/ ethanol mills in Brazil”. *Energy for Sustainable Development – Volume V N° 1 – 2001*. Prepared by the technical staff of the CTC – Copersucar.

As demonstrated above, the sugarcane industry sector has been informed about the Clean Development Mechanism and has been proactive in participating in the CDM. Therefore, the sugarcane sector and consequently the Santo Antonio and the Sao Francisco mills are taking a hands-on approach in the CDM.

There were private communications between Ecoinvest and Grupo Balbo since 2000 regarding the potential to develop the project as CDM project. There is an email that proves this communication took place prior to the starting date of the project activity. The evidence is dated from 8th June 2000 and it is available upon request.

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

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

⁴ UNICA – www.unica.com.br

⁵ IETA – www.ieta.org



1. The alternative to the project activity for the investors is the continuation of the current (previous) situation, with the investment of surplus capital in the financial market. The main project sponsor had no previous experience with the power market.

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

2. The alternative is in compliance with all applicable legal and regulatory requirements.
3. Non-applicable.
4. The project activity and the alternative scenario are in compliance with the legal and regulatory requirements.

Step 3. Barrier Analysis:

To substantiate the barrier analysis, a brief overview of the Brazilian electricity market in the last years is first presented.

Until the beginning of the 1990's, the energy sector was composed almost exclusively of state-owned companies. From 1995 on due to the increase of international interest rates and the lack of investment capacity of the State, the government was forced to look for alternatives. The solution recommended was to initiate a privatization process and the deregulation of the market.

The four pillars of the privatization process initiated in 1995 were:

Building a competition friendly environment, with the gradual elimination of the captive consumer. The option to choose an electricity services supplier, which began in 1998 for the largest consumers, and should be available to the entire market in 2006;

Dismantling of the state monopolies, separating and privatizing the activities of generation, transmission and distribution;

Allowing free access to the transmission lines, and

Placing the operation and planning responsibilities to the private sector.

Three governmental entities were created, the Electricity Regulatory Agency, ANEEL set up to develop the legislation and to regulate the market; the National Electric System Operator, ONS, to supervise and control the generation, transmission and operation; and the Wholesale Electricity Market, MAE, to define rules and commercial procedures of the short-term market.

At the end of 2000, after five years of privatization, the results were modest (Figure 10). Despite high expectations, investments in new generation did not follow the increase in consumption.

The decoupling of GDP (average of 2% increase in the period of 1980 to 2000) from electricity consumption increase (average of 5% increase in the same period) is well known in developing countries, mainly due to the expansion of the supply services to new areas and the growing infra-structure. The necessary measures to prevent bottlenecks in services were taken. These include an increase of generation capacity higher than the GDP growth rate and strong investments in energy efficiency. In the Brazilian case, the increase in the installed generation capacity (average of 4% in the same period) did not follow the growth of consumption as can be seen in Figure 11.

Without new installed capacity, the only alternatives were energy efficiency improvements or higher capacity utilization (capacity factor). Regarding energy efficiency, the government established in 1985 PROCEL (the National Electricity Conservation Program). Although the results of the program were remarkable, the efficiency achievement was not big enough to cover the mentioned gap between the need of new generation capacity and consumption growth.

The remaining alternative, to increase the capacity factor of the old plants, was actually the most widely used, as can be seen in Figure 12. To understand if such increase in capacity factor brought



positive or negative consequences one needs to analyze the availability and price of fuel. In the Brazilian electricity model the primary energy source is the water accumulated in the reservoirs. Figure 13 shows what happened to the levels of “stored energy” in the reservoirs from January 1997 to January 2002. It can be seen that reservoirs which were planned to withstand 5 years of less-than-average rainy seasons, almost collapsed after a single season of low rainfall (2000/2001 experienced 74% of the historical average rain. This situation depicts a very intensive use of the country’s hydro resources to support the increase in demand without increase of installed capacity. Under the situation described there was still no long-term solution for the problems that finally caused shortage and rationing in 2001.

Aware of the difficulties since the end of the 1990’s, the Brazilian government signalized that it was strategically important for the country to increase thermoelectric generation and consequently be less dependent of hydropower. With that in mind the federal government launched in the beginning of the year of 2000 the *Thermoelectric Priority Plan (PPT, “Plano Prioritário de Termelétricas”*, Federal Decree 3,371 of February 24th, 2000, and Ministry of Mines and Energy Directive 43 of February 25th, 2000), originally planning the construction of 47 thermo plants using Bolivian natural gas, totalizing 17,500 MW new installed capacity until December of 2003. During 2001 and the beginning of 2002 the plan was rearranged to 40 plants and 13,637 MW to be installed until December 2004 (Federal Law 10,438 of April 26th, 2002, Article 29). As of today, December 2004, 20 plants totalizing around 9,700 MW are operational.

During the rationing of 2001 the government also launched the *Emergency Energy Program* with the short-term goal of building 58 small to medium thermal power plants until the end of 2002 (using mainly diesel oil, 76.9 %, and residual fuel oil, 21.1 %), totalizing 2,150 MW power capacity (CGE-CBEE, 2002).

It is clear though that hydroelectricity is and will continue as the main source responsible for the electricity base load in Brazil. However, most if not all-hydro resources in the South and Southeast of the country have been exploited, and most of the remaining reserves are located in the Amazon basin, far from the industrial and population centers (OECD, 2001). Clearly, new additions to Brazil’s electric power sector are shifting from hydroelectricity to natural gas plants (Schaeffer *et al.*, 2000). With discoveries of vast reserves of natural gas in the Santos Basin in 2003 (Figure 14) the policy of using natural gas to generate electricity remains a possibility and it still will continue to have interest from private-sector investments in the Brazilian energy sector.

In power since January 2003, the new elected government decided to fully review the electricity market institutional framework. Congress approved a new model for the electricity sector in March 2004. The new regulatory framework for the electricity sector has the following key features (OECD, 2005):

- Electricity demand and supply will be coordinated through a “Pool” Demand will be estimated by the distribution companies, which will have to contract 100 per cent of their projected electricity demand over the following 3 to 5 years. These projections will be submitted to a new institution (*Empresa de Planejamento Energético, EPE*), which will estimate the required expansion in supply capacity to be sold to the distribution companies through the Pool. The price at which electricity will be traded through the Pool is an average of all long-term contracted prices and will be the same for all distribution companies.
- In parallel to the “regulated” long-term Pool contracts, there will be a “free” market. Although in the future, large consumers (above 10 MW) will be required to give distribution companies a 3-year notice if they wish to switch from the Pool to the free market and a 5-year notice for those moving in the opposite direction a transition period is envisaged during which these conditions will be made more flexible. These measures have the potential to reduce market volatility and allow distribution companies to better estimate market size. If actual demand turns out to be higher than projected, distribution companies will have to buy electricity in the free market. In the opposite case, they will sell the excess supply in the free



market. Distribution companies will be able to pass on to end consumers the difference between the costs of electricity purchased in the free market and through the Pool if the discrepancy between projected and actual demand is below 5 per cent. If it is above this threshold, the distribution company will bear the excess costs.

- The government opted for a more centralized institutional set-up, reinforcing the role of the Ministry of Mines and Energy in long-term planning. EPE will submit to the Ministry its desired technological portfolio and a list of strategic and non-strategic projects. In turn, the Ministry will submit this list of projects to the National Energy Policy Council (*Conselho Nacional de Política Energética*, CNPE). Once approved by CNPE, the strategic projects will be auctioned on a priority basis through the Pool. Companies can replace the non-strategic projects proposed by EPE, if their proposal offers the same capacity for a lower tariff. Another new institution is a committee (*Comitê de Monitoramento do Setor Elétrico*, CMSE), which will monitor trends in power supply and demand. If any problem is identified, CMSE will propose corrective measures to avoid energy shortages, such as special price conditions for new projects and reserve of generation capacity. The Ministry of Mines and Energy will host and chair this committee. No major further privatizations are expected in the sector.

Although one of the new model biggest aims is to reduce market risk, its ability to encourage private investment will depend on how the new regulatory framework is implemented. Several challenges are noteworthy in this regard. *First*, the risk of regulatory failure that might arise due to the fact that the government will have a considerable bigger role to play in long-term planning should be avoided by close monitoring of new rules applicability. *Second*, rules will need to be designed for the transition from the current to the new model to allow current investments to be rewarded adequately. *Third*, because of its small size, price volatility may increase in the short-term electricity market, in turn bringing about higher investment risk, albeit this risk will be attenuated by the role of large consumers. The high share of hydropower in Brazil's energy mix and uncertainty over rainfall also contribute to higher volatility of the short-term electricity market. *Fourth*, although the new model will require total separation between generation and distribution, regulations for the unbundling of vertically integrated companies still have to be defined. Distribution companies are currently allowed to buy up to 30 per cent of their electricity from their own subsidiaries (self-dealing). *Finally*, the government's policy for the natural gas sector needs to be defined within a specific sectoral framework.

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

Investment Barrier

In order to analyse accurately the investment environment in Brazil, the Brazilian Prime Rate, known, as SELIC rate, as well as the CDI – Interbank Deposit Certificate, which is the measure of value of value in the short-term credit market, need to be taken into account. Real interest rates have been extraordinarily high since the Real plan stabilized inflation in 1994.

As a consequence of the long period of inflation, the Brazilian currency experienced a strong devaluation, effectively precluding commercial banks from providing any long-term debt financing. The lack of a long-term debt market has caused a severe negative impact on the financing of energy projects in Brazil.

Interest rates for local currency financing are significantly higher than for US Dollar financing. The National Development Bank – BNDES is the only supplier of long-term loans. Debt financing from BNDES are made primarily through commercial banks. The credit market is dominated by shorter maturities (90-days to 1-year) and long-term credit lines are available only to the strongest corporate borrowers and for special government initiatives. Credit is restricted to the short-term in Brazil or the long-term in dollars offshore.



Financial domestic markets with a maturity of greater than 1 year are practically non-existent in Brazil. Experience has shown that in moments of financial stress the duration of savings instruments have contracted to levels close to one day with a massive concentration in overnight banking deposits. Savers do not hold long-term financial contracts due to the inability to price-in the uncertainty involved in the preservation of purchasing power value. (Arida et al., 2005).

The lack of a local long-term market results not from a disinterest of financial investment opportunities, but from the reluctance of creditors and savers to lengthen the term of their placements. It has made savers opt for the most liquid investments and to place their money in short-term government bonds instead of investing in long-term opportunities that could finance infrastructure projects.

The most liquid government bond is the LFT (floating rate bonds based on the daily Central Bank reference rate). As of January 2004, 51.1% of the domestic federal debt was in LFTs and had duration of one day. This bond rate is almost the same as the CDI - Interbank Deposit Certificate rate that is influenced by the SELIC rate, defined by COPOM⁶.

The SELIC Rate has been oscillating since 1996 from a minimum of 15% p.a. in January 2001 to a maximum of 45% p.a. in March 1999, as it is possible to see in Figure 15.

The Bioenergia project was developed on a project finance basis. To finance construction, project sponsor (Balbo Group) took advantage of the financing lines of BNDES. This financial support covered 57% of the project costs with a rate of TJLP (BNDES Long Term Interest Rate – 10%) plus a 5% spread risk for a term of 8-year and 1-year grace period.

As can be seen in the worksheet FCF_Bioenergia(CER)⁷, the Project was set up with an expected financial IRR – Internal Rate of Return of the approximately 18% per year. The project's IRR is very similar to the SELIC rate in effect at the time of financing although the project is a riskier investment as compared to Brazilian government bonds. The inclusion of the revenues from CERs makes the project's IRR increase in about 200 basis point from 18,4% to 20,5%. Such increase in return would compensate for the additional risk investor would take with this project.

In addition to the increase of 200 basis points, CER revenues would bring the project additional benefits due to the fact that they are generated in hard currencies (USD or EUR). The CDM incentive allows Grupo Balbo to hedge its debt cash flow against currency devaluation. Moreover, the CER Free Cash Flow, in US dollars or EURO, could be discounted at an applicable discount interest rate, thus increasing the project leverage.

The high level of guarantees required to finance an energy project in Brazil is a barrier for developing new projects. Insurance, financial guarantees, financial advisories are requirements which increase the cost of the project and are barriers to project achievability.

Other financial barriers are related to the power purchase agreement (PPA). The PPA is required in order to obtain long-term financing from a bank and the lack of adequate commercial agreements from the energy buyers may influence directly the negotiation between the bank and the project developer. Most of the utilities in Brazil do not have a satisfactory credit risk thus representing a barrier to obtain long-term funding.

The conclusion is that CDM incentives play a very important role in overcoming financial barriers (Table 5).

Institutional Barrier

As described above, since 1995 government electricity market policies have been continuously changing in Brazil. Too many laws and regulations were created to try to organize and to provide

⁶ COPOM – Comitê de Política Monetária (Monetary Policy Committee).

⁷ The worksheet is available for consultant



incentives for new investments in the energy sector. The results of such regulatory instability were the contrary to what was trying to be achieved. During the rationing period electricity prices surpassed BR\$ 600/MWh (around USD 200/MWh) and the forecasted marginal price of the new energy reached levels of BR\$ 120 – 150/MWh (around USD 45). In the middle of 2004 the average price was below BR\$ 50/MWh (less than USD 20/MWh). The volatility of the electricity price in Brazil has a correlation with the instability in government policies in the period, with 3 different regulatory environments in a 10-year period (from 1995 to 2004). In theory the new regulatory framework has the potential to reduce market risk considerably. Nevertheless only time will prove the efficiency of the new model in relation to market risks reduction and private investment attraction⁸. In that sense, it will be interesting to evaluate the results of the first auction of licenses for the construction of new power plants in order to correctly assess the success of the implementation of the new regulatory framework.

Cultural Barrier

The history of the sugarcane industry has demonstrated that the industry is a traditional stable business and has consistently helped to support the country's economy. It has historically enjoyed governmental support such as fixed prices and subsidies. Another characteristic of this sector is the specialization in commodity (sugar and ethanol) transactions. Therefore, the cultural barrier is a considerable obstacle since the generation of electricity to sell to the grid and the electricity negotiation in the market is something relatively new to this industry, which can be in part overcome with the Clean Development Mechanism.

Sub-step 3b. Show that the identified barriers would not prevent the implementation of at least one of the alternatives:

As described above, the main alternative to the project activity is to continue the status quo. The project sponsor could invest their resources in different financial market investments. Therefore the barriers above have not affected the investment in other opportunities. To the contrary Brazilian interest rates, which represent a barrier for the project activity, is a viable investment alternative.

Step 4. Common practice analysis

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

Some sugar mills have optimized their power plants in order to export electricity; numerous risks and barriers have prevented the implementation of the proposed project activity among the majority of the sugar mills. In the Centre-South Region, there are more than 250 sugar mills producing sugar, ethanol and electricity for their self-consumption but less than 30 mills have developed expansion programs for their power plants.

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

Risks and barriers are related to the operational and technical issues associated with small cogeneration projects, including their capability to comply with the PPA contract and the potential non-performance penalties. Moreover, traditional sugar producers would prefer concentrating investments on their traditional business (sugar and ethanol) than venturing in new projects with new risks and low returns (see Investment Barrier) where they have little or no know-how.

⁸ The reform of the legal framework of the Brazilian electricity sector started with Provisional Measure No. 144, later converted into Law No. 10,848, of 15 March 2004 - was unveiled with the publication of Decree No. 5,163, of 30 July 2004.



Regardless of the risks and barriers mentioned above, the main reason for the reduced number of similar project activities is the economic cost. Project feasibility requires a PPA contract with a utility company, but the utilities do not have the incentives or motivation to buy electricity generated by small cogeneration projects. The marginal cost for electricity expansion is US\$ 33/MWh⁹ and the cost of cogeneration electricity ranges from US\$ 35 to US\$ 50.

The electricity generation costs of the project activity vary between 31\$/MWh (USD 1 to 3 Real) to 39.6\$/MWh (USD 1 to 2.35 Real).

Because of reasons mentioned above, no more than 10% of the sugar mills in the Centre-South region have developed similar activities to that of Bioenergia and the majority of these project developers have taken into consideration CDM in their decision to expand their cogeneration plant.

The intention of Balbo Group to diversify its revenues and hedge against the volatility of sugar and ethanol prices was fundamental for the company to set up this pioneer project and create the Bioenergia Cogeneration Project. The company has also been a pioneer in looking for CER revenues to increase the project IRR and consequently making it economically feasible.

Step 5 – Impact of CDM Registration

The sugarcane plantation is part of the country's colonization period. The commercialization of sugarcane has become part of the Brazilian culture was introduced during the XVI century when the Portuguese colonized the country. Brazil became the first producer and exporter of sugar in the world. Since then, sugarcane has been an important part of the Brazilian agricultural industry.

Currently in Brazil, there are more than 5 million hectares of land producing sugarcane and there are more than 320 sugar mills producing sugar, ethanol and electricity to supply their own energy consumption. Consequently the potential to generate electricity for commercialization (exporting to the grid), is estimated at around 20 GW. This potential has always existed and has grown as the sugarcane industry has grown. However the investments to expand the sugar mills' power plants have only occurred since 2000. Although a flexible legislation allowing independent energy producers has existed since 1995, it was only after 2000 that sugar producers started to study this proposed project activity as an investment alternative for their power plants in conjunction with the introduction of the CDM.

The CDM has made it possible for the mills set up their cogeneration plants and export excess electricity to the grid by helping to overcome financial barriers through the financial benefits obtained from CDM revenues; this is summarized in Table 5. Additionally, CDM has helped to overcome institutional and cultural barriers since the CDM has made the project sponsors take more seriously into consideration the generation of renewable electricity.

Therefore, the registration of the proposed project activity will have a strong impact in paving the way for similar projects to be implemented in Brazil, which may bring about among other things development in technologies.

This kind of activity will be encouraged once this project activity gets registered.

⁹ MME – Ministério de Minas e Energia (Ministry of Mines and Energy) www.mme.gov.br Valor Econômico da Tecnologia Específica da Fonte – VETEF “Programa de Incentivo às Fontes Alternativas de Energia Elétrica”)

**B.4. Description of how the definition of the project boundary related to the baseline methodology selected is applied to the project activity****Project Boundary**

In the Bioenergia Coneration Project, an existing power plant was retrofitted with new modified parts of certain equipment (boiler, steam turbine, transmission lines, etc.) in order to optimize the energy use inside a sugarcane mill, and allow the export of electricity to the grid.

Today the sugar and alcohol production plant is self-sufficient in energy use and generation. All the bagasse delivered from the milling of the sugarcane is burned for production of steam and subsequent production of electricity as can be seen in see in Figure 16.

Within the project boundary the only new sources of emission will be related to construction and installation of the new equipment and transmission lines. No expansion of the milling capacity is planned and therefore no new biomass will be burned and no new continuous source of greenhouse gases will be created.

Energy Grid Boundary

The South/Southeast and Midwest section of the interconnected subsystem of the Brazilian grid is where the project activity is located and is considered boundary. In this part of the country the majority of the electricity is generated and also accounts for 70% of GDP. This subsystem receives electricity exported from Bioenergia cogeneration plant which uses bagasse as fuel (Figure 17).

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

The date of completing the final draft of this baseline section was 23/09/2005.

Company:	Ecoinvest Carbon
Address:	Rua Padre João Manoel, 222
Zip code + city address:	01411-000 São Paulo, SP
Country:	Brazil
Contact person:	A. Ricardo J. Esparta
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Telephone number:	+55 (11) 3063-9068
Fax number:	+55 (11) 3063-9069
E-mail:	esparta@ecoinvestcarbon.com

**SECTION C. Duration of the project activity / Crediting period.****C.1. Duration of the project activity****C.1.1. Starting date of the project activity**

UTE Usina Santo Antonio “USA” project started in 21/06/2002.

UTE Usina São Francisco “USFR” project started in 18/08/2002.

C.1.2. Expected operational lifetime of the project activity

20y-0m

C.2. Choice of the crediting period and related information**C.2.1. Renewable crediting period****C.2.1.1. Starting date of the first crediting period**

Crediting period started in 21/06/2002.

C.2.1.2. Length of the first crediting period

07y-0m

C.2.2. Fixed crediting period

Not applicable

C.2.2.1. Starting date

Not applicable

C.2.2.2. Length

Not applicable



CDM – Executive Board

SECTION D. Application of a monitoring methodology and plan**D.1. Name and reference of approved monitoring methodology applied to the project activity**

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 project activity

The chosen methodology is applicable to all bagasse-based cogeneration projects connected to the grid. The monitoring methodology and plan considers monitoring emission reductions generated from cogeneration projects using sugarcane bagasse as fuel.

The main data to be considered in determining the emissions reductions is the electricity exported to the grid. The emissions reduction is reached by applying an emissions factor through the electricity dispatched to the grid, that is verified and monitor by a two party verification: by the power plant that sells the electricity and by the utility company that buys the electricity.

D.2.1. Option 1: Monitoring of the emissions in the project scenario and the baseline scenario

The project emissions (PE_p) are zero; therefore table D.2.1.1 below is empty.

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	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 CO_{2e})**

The project emissions (PE_y) are zero, therefore no formula for calculation of direct emissions are necessary.

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

ID number	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
1. EG_y	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	Data is being archived and administered by Bioenergia
2. EF_y	Emission Factor	Calculated	tCO ₂ /MWh	(c)	At the validation and after registration	0%	Electronic	Data is available under request. Factors were calculated according to the Approved monitoring methodology AM0015
3. $EF_{om,y}$	Emission factor	Calculated	tCO ₂ /MWh	(c)	At the validation and after registration	0%	Electronic	Data is available under request. Factors were calculated according to the Approved monitoring methodology AM0015
4. $EF_{BM,y}$	Emission factor	Calculated	tCO ₂ /MWh	(c)	At the validation and after registration	0%	Electronic	Data is available under request. Factors were calculated according to the Approved monitoring methodology AM0015



5. λ_y	Fraction of time during which low-cost/must-run sources are on the margin	Calculated	Non dimensional	(c)	At the validation and after registration	0%	Electronic	Data is available under request. Factors were calculated according to the Approved monitoring methodology AM0015
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D.2.1.4. Description of formulae used to estimate baseline emissions (for each gas, source, formulae/algorithm, emissions units of CO_{2e})

According to the selected approved methodology (AM-0015), the baseline emission factor is calculated as (EF_y) is calculated as a combined margin (CM), consisting of the combination of operating margin (OM) and build margin (BM) factors. For the purpose of determining the build margin and the operating margin emission factors, a project electricity system is defined by the spatial extent of the power plants that can be dispatched without significant transmission constraints. Similarly a connected electricity system is defined as an electricity system that is connected by transmission lines to the project electricity system and in which power plants can be dispatched without significant transmission constraints.

From AM-0015, a baseline emission factor (EF_y) is calculated as a combined margin (CM), consisting of the combination of operating margin (OM) and build margin (BM) factors according to the following three steps:

- **STEP 1** - Calculate the operating margin emission factor(s), based on one of the following methods
 - Simple operating margin
 - Simple adjusted operating margin
 - Dispatch data analysis operating margin
 - Average operating margin.

The second alternative, simple adjusted operating margin will be used here.

The simple adjusted operating margin emission factor ($EF_{OM,adjusted,y}$ in tCO₂/MWh) is a variation on the simple operating margin, where the power sources (including imports) are separated in low-cost/must-run power sources (k) and other power sources (j):



$$EF_{OM, simple-adjusted, y} = (1 - \lambda_y) \frac{\sum_{i,j} F_{i,j,y} \cdot COEF_{i,j}}{\sum_j GEN_{j,y}} + \lambda_y \cdot \frac{\sum_{i,k} F_{i,k,y} \cdot COEF_{i,k}}{\sum_k GEN_{k,y}}$$

Equation 1

Where:

- λ_y is the share of hours in year y (in %) for which low-cost/must-run sources are on the margin.
- $\sum_{i,j} F_{i,j,y}$ is the amount of fuel i (in mass or volume unit) consumed by relevant power sources j (analogous for sources k) in year(s) y ,
- $COEF_{i,j}$ is the CO_{2e} coefficient of fuel i (tCO_{2e}/mass or volume unit of the fuel), taking into account the carbon dioxide equivalent emission potential of the fuels used by relevant power sources j (analogous for sources k) and the percent oxidation of the fuel in year(s) y and,
- $\sum_j GEN_{j,y}$ is the electricity (MWh) delivered to the grid by source j (analogous for sources k),
- **STEP 2** – Calculate the build margin mission factor ($EF_{BM,y}$) as the generation weighted average emission factor (tCO_{2e}/MWh) of a sample of power plants m , as follows:

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

Equation 2

Where $F_{i,m,y}$, $COEF_{i,m}$ and $GEN_{m,y}$ are analogous to the variables described for the simple OM method (AM-0015) for plants m , based on the most recent information available on plants already built. The sample group m consists of either

- The five power plants that have been built most recently, or
- The power plants capacity additions in the electricity system that comprise 20% of the system generation (in MWh) and that have been built most recently.

Project participants should use from these two options that sample group that comprises the larger annual generation.

**CDM – Executive Board**

- **STEP 3** – Calculate the baseline emission factor EF_y , as the weighted average of the operating margin factor ($EF_{OM,y}$) and the build margin factor ($EF_{BM,y}$):

$$EF_y = w_{OM} \cdot EF_{OM,y} + w_{BM} \cdot EF_{BM,y} \quad \text{Equation 3}$$

Where the weights are by w_{OM} and w_{BM} , by default, are 50% (i.e., $w_{OM} = w_{BM} = 0.5$).

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

Not applicable.

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	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 CO_{2e})

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 leakage effects of the project activity.**

ID number	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



Indirect emissions can result from project construction, transportation of materials, fuel and other upstream activities. Fossil fuel is not used for combustion support. No other fuel is used in the sugar mills but bagasse. Therefore, the project does not claim emission reductions from these activities. No significant net leakage from these activities was identified.

Thus, no sources of emissions were identified, and therefore no data will be collected and archived. There are no entries in the table D.2.3.1 above.

D.2.3.2. Description of formulae used to estimate leakage (for each gas, source, formulae/algorithm, emissions units of CO₂e)

Leakage is not applicable to the projects activity approved methodology

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

The project activity mainly reduces carbon dioxide through substitution of grid electricity generation with fossil fuel fired power plants by renewable electricity. The emission reduction by the project activity (ER_y) during a given year (y) is the difference between the baseline emissions (BE_y , in tCO₂), project emissions (PE_y , in tCO₂e) and due to leakage (L_y , in tCO₂e), as follows:

$$ER_y = BE_y - PE_y - L_y \quad \text{Equation 4}$$

Where the baseline emissions are the product of the the electricity supplied by the project to the grid (EG_y in MWh) times the baseline emission factor (EF_y in tCO₂e/MWh), as follows:

$$BE_y = EG_y \cdot EF_y \quad \text{Equation 5}$$

Project emissions are the sum of the fugitive carbon dioxide and methane emissions due to the release of non-condensable gases from the produced steam (PES_y , in tCO₂) and carbon dioxide emissions from fossil fuel combustion ($PEFF_y$, in tCO₂), as follows:

$$PE_y = PES_y + PEFF_y \quad \text{Equation 6}$$

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The main emissions giving rise due to leakage in the context of electric sector projects are emissions arising due to activities such as power plant construction, fuel handling (extraction, processing and transport). Project participants do not need to consider these emissions as leakage in applying this methodology. Therefore:

$$L_y = 0$$

Equation 7

D.3. Quality control (QC) and quality assurance (QA) procedures are being undertaken for data monitored		
Data (Indicate table and ID number e.g. 3.1; 3.2.)	Uncertainty level of data (High/Medium/Low)	Explain QA/QC procedures planned for these data, or why such procedures are not necessary.
1	Low	Data is being monitored by the Bioenergia and the utility company.
2	Low	Data acquired from ONS and ANEEL and does not need to be monitored.
3	Low	Data acquired from ONS and ANEEL and does not need to be monitored.
4	Low	Data acquired from ONS and ANEEL and does not need to be monitored.
10	Low	Data acquired from ONS and ANEEL and 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 leakage effects, generated by the project activity

As the project is neither associated with leakage effects nor with new emissions of pollutants and all other pertinent data is necessary to be analyzed and presented only at the validation phase of the project, the only data that has to be monitored going forward during the life of the contract is the electricity supplied to the grid by the project (EG_y).

This data is monitored through a spreadsheet that has to collect by meters installed in the exit of the mill and entrance of the transmission lines and by the sales receipts issued by the electricity utility to the mill.

D.5. Name of person/entity determining the monitoring methodology



Company: Ecoinvest Carbon
Address: Rua Padre João Manoel, 222
Zip code + city address: 01411-000 São Paulo, SP
Country: Brazil
Contact person: A. Ricardo J. Esparta
Job title: Director
Telephone number: +55 (11) 3063-9068
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E-mail: esparta@ecoinvestcarbon.com

**SECTION E. Estimation of GHG emissions by sources****E.1. Estimate of GHG emissions by sources**

Based on the renewable source of technology, the project emissions (PE_y) are zero. Therefore, no calculation of estimate of GHG emissions is necessary.

$$PE_y = 0 \quad \text{Equation 8}$$

E.2. Estimated leakage

Indirect emissions can result from project construction, transportation of materials and fuel and other upstream activities. Nevertheless no significant net leakage from these activities was identified.

$$L_y = 0 \quad \text{Equation 9}$$

E.3. The sum of E.1 and E.2 representing the project activity emissions

Given there are no entries for both E.1 and E.2, the sum in E.3 is zero.

$$PE_y + L_y = 0 \text{ tCO}_2\text{e} \quad \text{Equation 10}$$

E.4. Estimated anthropogenic emissions by sources of greenhouse gases of the baseline

According to the selected approved methodology (AM-0015), the baseline emission factor is defined as (EF_y) and is calculated as a combined margin (CM), consisting of the combination of operating margin (OM) and build margin (BM) factors. For the purpose of determining the build margin and the operating margin emission factors, a project electricity system is defined by the spatial extent of the power plants that can be dispatched without significant transmission constraints. Similarly a connected electricity system is defined as an electricity system that is connected by transmission lines to the project electricity system and in which power plants can be dispatched without significant transmission constraints.

Brazil's electric power system is geographically divided in 5 macro-regions: South (S), Southeast (SE), Midwest (CO, from the Portuguese *Centro-Oeste*), North (N) and Northeast (NE). Regarding the electricity system, three different electric systems supply the five macro-regions of the country. The largest interconnected power transmission system, which includes the Southeast, South, and Mid-West regions, accounts for more than 70% of the Brazilian total installed capacity. It includes the hydroelectric power plant of Itaipu, and the only two nuclear power plants currently in operation in Brazil: Angra I (657 MW), and Angra II (1309 MW). The second interconnected grid system connects the north and northeast regions, accounting for almost 25% of the Brazilian total installed capacity. Finally, the third system includes small, independent grids that are isolated in terms of electric power, largely in the northern region. These isolated systems accounted for less than 5% and are based mainly on thermal power plants (SIESE, 2002).



The Bioenergia project is located in the State of São Paulo and is integrated to the South-Southeast-Midwest (S-SE-CO) connected electricity system.

From AM-0015, a baseline emission factor (EF_y) is calculated as a combined margin (CM), consisting of the combination of operating margin (OM) and build margin (BM) factors according to the following three steps:

- **STEP 1** - Calculate the operating margin emission factor(s), based on one of the following methods
 - Simple operating margin
 - Simple adjusted operating margin
 - Dispatch data analysis operating margin
 - Average operating margin.

Dispatch data analysis operating margin should be the first methodological choice. Since not enough data was supplied by the Brazilian national dispatch center, the choice is not currently available. The simple operating margin can only be used where low-cost/must-run resources¹⁰ constitute less than 50% of total grid generation in: 1) average of 5 most recent years, or 2) based on long-term normalcy for hydroelectricity production. Table 6 shows the share of hydroelectricity in the total electricity production for the Brazilian S-SE-CO interconnected system. However, the results show the non-applicability of the simple operating margin to the Bioenergia project.

The fourth alternative, an average operating margin, is an oversimplification and, due to the high share of a low operating cost/must run resource (hydro), does not reflect at all the impact of the project activity in the operating margin. Therefore, the simple adjusted operating margin will be used here.

The simple adjusted operating margin emission factor ($EF_{OM,adjusted,y}$ in tCO₂/MWh) is a variation on the simple operating margin, where the power sources (including imports) are separated in low-cost/must-run power sources (k) and other power sources (j):

$$EF_{OM, simple-adjusted,y} = (1 - \lambda_y) \cdot \frac{\sum_{i,j} F_{i,j,y} \cdot COEF_{i,j}}{\sum_j GEN_{j,y}} + \lambda_y \cdot \frac{\sum_{i,k} F_{i,k,y} \cdot COEF_{i,k}}{\sum_k GEN_{k,y}} \quad \text{Equation 11}$$

Where:

- λ_y is the share of hours in year y (in %) for which low-cost/must-run sources are on the margin.
- $\sum_{i,j} F_{i,j,y}$ is the amount of fuel i (in mass or volume unit) consumed by relevant power sources j (analogous for sources k) in year(s) y ,
- $COEF_{i,j}$ is the CO_{2e} coefficient of fuel i (tCO_{2e}/mass or volume unit of the fuel), taking into account the carbon dioxide equivalent emission potential of the fuels used by relevant power sources j (analogous for sources k) and the percent oxidation of the fuel in year(s) y and,
- $\sum_j GEN_{j,y}$ is the electricity (MWh) delivered to the grid by source j (analogous for sources k),

¹⁰ Low operating cost and must run resources typically include hydro, geothermal, wind, low-cost biomass, nuclear and solar generation (AM-0015).

**CDM – Executive Board**

The most recent numbers for the interconnected S-SE-CO system were obtained from the Brazilian national dispatch center, ONS (from the Portuguese *Operador Nacional do Sistema Elétrico*) in the form of daily-consolidated reports (ONS-ADO, 2004). Data from 120 power plants, comprising 63.6 GW installed capacity and around 828 TWh electricity generation over the 3-year period were considered. With the numbers from ONS, Equation 5 is calculated, as described below:

$$EF_{OM,y} = \frac{\sum_j F_{i,j,y} \cdot COEF_{i,j}}{\sum_j GEN_{j,y}} \quad \text{Equation 12}$$

Where:

- $EF_{OM,y}$ is the simple operating margin emission factor (in tCO₂/MWh), or the emission factor for low-cost/must-run resources by relevant power sources j in year(s) y .

Low-cost/must-run resources in Brazilian S-SE-CO interconnected system are hydro and thermonuclear power plants, considered free of greenhouse gases emissions, i.e., $COEF_{i,j}$ for these plants is zero. Hence, the emission factor for low-cost/must-run resources results, $EF_{OM,y} = 0$.

$$EF_{OM-non,y} = \frac{\sum_k F_{i,k,y} \cdot COEF_{i,k}}{\sum_k GEN_{j,k}} \quad \text{Equation 13}$$

Where:

- $EF_{OM-non,y}$ is emission factor for non-low-cost/must-run resources (in tCO₂/MWh) by relevant power sources k in year(s) y .

Non-low-cost/must-run resources in Brazilian S-SE-CO interconnected system are thermo power plants burning coal, fuel oil, natural gas and diesel oil. These plants result in non-balanced emissions of greenhouse gases, calculated as follows:

The product $\sum_{i,k} F_{i,k,y} \cdot COEF_{i,k}$ for each one of the plants was obtained from the following formulae:

$$F_{i,k,y} = \frac{GEN_{i,k,y} \cdot 3,6 \times 10^{-6}}{\eta_{i,k,y} \cdot NCV_i} \quad \text{Equation 14}$$

$$COEF_{i,k} = NCV_i \cdot EF_{CO2,i} \cdot 44/12 \cdot OXID_i \quad \text{Equation 15}$$

$$\text{Hence, } F_{i,k,y} \cdot COEF_{i,k} = \frac{GEN_{i,k,y} \cdot EF_{CO2,i} \cdot OXID_i \cdot 44/12 \cdot 3,6 \times 10^{-6}}{\eta_{i,k,y}} \quad \text{Equation 16}$$

Where variable and parameters used are:

- $\sum_{i,j} F_{i,j,y}$ is given in [kg], $COEF_{i,j}$ in [tCO₂e/kg] and $F_{i,k,y} \cdot COEF_{i,k}$ in [tCO₂e]
- $GEN_{i,k,y}$ is the electricity generation for plant k , with fuel i , in year y , obtained from the ONS database, in MWh
- $EF_{CO2,i}$ is the emission factor for fuel i , obtained from the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories, in tC/TJ.



- $OXID_i$ is the oxidization factor for fuel i , obtained from the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories, in %.
- 44/12 is the carbon conversion factor, from tC to tCO₂.
- $3,6 \times 10^{-6}$ is the energy conversion factor, from MWh to TJ.
- $\eta_{i,k,y}$ is the thermal efficiency of plant k , operating with fuel i , in year y , obtained from Bosi et al. (2002).
- NCV_i is the net calorific value of fuel i [TJ/kg].

$\sum_{k,y} GEN_{k,y}$ is obtained from the ONS database, as the summation of non-low-cost/must-run resources electricity generation, in MWh.

The λ_y factors are calculated as indicated in methodology ACM0015, with data obtained from the ONS database. Figure 18, Figure 19 and Figure 20 present the load duration curves and λ_y calculations for years 2002, 2003 and 2004, respectively.

The results for years 2002, 2003 and 2004 are presented in Table 7.

Table 7 – Share of hours in year y (in %) for which low-cost/must-run sources are on the margin in the S-SE-CO system for the period 2002-2004 (ONS-ADO, 2005).

Year	$\frac{\sum_{i,k} F_{i,k,y} \cdot COEF_{i,k}}{\sum_k GEN_{k,y}}$ [tCO ₂ /MWh]	λ_y [%]
2002	0.850	0.5053
2003	0.938	0.5312
2004	0.873	0.5041

With the numbers from ONS, the first step was to calculate the lambda factors and the emission factors for the simple operating margin. The obtained values can be seen in Table 8, Figure 18, Figure 19, and Figure 20.

Finally, applying the obtained numbers to calculate $EF_{OM, simple-adjusted, 2002-2004}$ as the weighted average of $EF_{OM, simple-adjusted, 2002}$, $EF_{OM, simple-adjusted, 2003}$ and $EF_{OM, simple-adjusted, 2004}$ and λ_y to Equation 1:

$$\bullet \quad EF_{OM, simple-adjusted, 2002-2004} = 0.4310 \text{ tCO}_2\text{e/MWh.}$$

- **STEP 2** – Calculate the build margin mission factor ($EF_{BM,y}$) as the generation weighted average emission factor (tCO₂e/MWh) of a sample of power plants m , as follows:

$$EF_{BM,y} = \frac{\sum_{i,m} F_{i,m,y} \cdot COEF_{i,m}}{\sum_m GEN_{m,y}} \quad \text{Equation 11}$$



Where $F_{i,m,y}$, $COEF_{i,m}$ and $GEN_{m,y}$ are analogous to the variables described for the simple OM method (AM0015, 2004) for plants m , based on the most recent information available on plants already built. The sample group m consists of either:

- The five power plants that have been built most recently, or
- The power plants capacity additions in the electricity system that comprise 20% of the system generation (in MWh) and that have been built most recently.

Project participants should use from these two options that sample group that comprises the larger annual generation.

Applying the data from the Brazilian national dispatch center to Equation 2:

$$\bullet \quad EF_{BM,2004} = 0.1256 \text{ tCO}_2\text{e/MWh.}$$

- **STEP 3** – Calculate the baseline emission factor EF_y , as the weighted average of the operating margin factor ($EF_{OM,y}$) and the build margin factor ($EF_{BM,y}$):

$$EF_y = w_{OM} \cdot EF_{OM,y} + w_{BM} \cdot EF_{BM,y} \quad \text{Equation 12}$$

Where the weights w_{OM} and w_{BM} , by default, are 50% (i.e., $w_{OM} = w_{BM} = 0.5$). With these numbers:

$$EF_y = 0.5 \times 0.4310 + 0.5 \times 0.1256$$

$$\bullet \quad EF_y = 0.2783 \text{ tCO}_2\text{e/MWh.}$$

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



Year	Estimation of project activity emission reductions (tonnes of CO _{2e})	Estimation of baseline emission reductions (tonnes of CO _{2e})	Estimation of leakage (tonnes of CO _{2e})	Estimation of emission reductions (tonnes of CO _{2e})
Year 1 2002*	-	14,471	0	14,471
Year 2 2003	-	18,895	0	18,895
Year 3 2004	-	20,370	0	20,370
Year 4 2005	-	21,913	0	21,913
Year 5 2006	-	21,913	0	21,913
Year 6 2007	-	21,913	0	21,913
Year 7 2008	-	21,913	0	21,913
Year 8 2009**	-	10,266	0	10,266
Total (tonnes of CO _{2e})	-	151,655	-	151,655

* Since June 2002

** Until June 2009

Table 9 – Bioenergia Cogeneration Estimated Emission Reductions

**SECTION F. Environmental impacts****F.1. Documentation on the analysis of the environmental impacts, including trans-boundary impacts**

The growing global concern on sustainable use of resources is driving a requirement for more sensitive environmental management practices. Increasingly this is being reflected in government policy and legislation. In Brazil the situation is not different. Environmental rules and licensing policies are very demanding in line with the best international practices.

In Brazil, the sponsor of a project which involves construction, installation, expansion or operation, even with no new significant environmental impact, must obtain new licenses (see State of São Paulo Environmental Secretary CONSEMA Resolution 42 of December 29th, 1994). The licenses required by the Brazilian environmental regulation is based on Resolution CONAMA n. 237/97, which is a federal legislation but also applies to the state level. The basic licences are:

- The preliminary license (“Licença Prévia” or LP),
- The construction license (“Licença de Instalação” or LI); and
- The operating license (“Licença de Operação” or LO).

As the Bioenergia Cogeneration project is a power plant expansion based on energy efficiency, the fast-track procedure to obtain the licenses can be used (Preliminary Environmental Report - “Relatório Ambiental Preliminar,” RAP). The process had been completed and a report containing an investigation of the following aspects has been produced:

- Resources usage
- Legislation to be observed
- Impacts to climate and air quality
- Geological and soil impacts
- Hydrological impacts (surface and groundwater)
- Impacts to the flora and animal life
- Socio-economical (necessary infra-structure, legal and institutional, etc.)
- Local stakeholders comments
- Mitigation measures
- Monitoring plan

The project also conforms with the subsidiary environmental legislation, such as Resolution CONAMA n.1, which applies to the noise levels, Resolution CONAMA n.3, which applies to the air quality and Resolution CONAMA n.20, which applies to the waste water and water quality. The Bioenergia Project has the authorization issued by ANEEL to operate as an independent power producer (ANEEL Resolution no. 403 of October 1st, 2001).

It also follows the municipal, state and federal environmental legislation.

Considering the municipality legislation (Sertãozinho), the project conforms with all the respective legislation. Also, it conforms to the land occupation legislation, subject to the Law no. 3,426 of November 10th, 1999.

As for the state legislation (São Paulo), the project is equally approved, including the ones corresponding to the soil, air and water treatment and emissions. The power plant has the Construction

**CDM – Executive Board**

License – nº 00229 (Figure 21) emitted by CETESB (www.cetesb.sp.gov.br), the environmental agency of the state of Sao Paulo.

Contributing to emission reductions is an important goal for Grupo Balbo, as it is committed to the environment and to the social and environmental sustainability. This policy is confirmed by Grupo Balbo's fulfilment of several public requirements such as:

- Certification “Embalagem Papel Cartão – Aprovado Pela Natureza” (Cardboard Packaging Paper - Approved By Nature). Aims to identify and certify products packaged in cardboard paper, by companies with environmental responsibility.

**BRACELPA - Associação Brasileira de Celulose e Papel.****Campanha Papel Cartão**

- Companies that forbid the nocturne, dangerous or unhealthy work for younger than 18 years old people, and any work for younger than 16 years old, except for apprentices after 14 years old. The company develops programs to assist children and teenagers.

**Fundação ABRINQ pelos direitos da criança**

- The industrial pollution system is audited on a semi-annual basis, objecting certify the plant quality system to conform to the international quality standards proposed by ISO-9001.

**BVQI (Bureau Veritas Quality International)****INMETRO (Instituto Nacional de Metrologia)**

- The industrial process conforms to the Jewish norms (Kosher).

**KOSHER PARVE****Rabbi M. A. Iliovits – Brazilian Kashrus Authority**

- The agroindustrial system is audited on a yearly basis, objecting certify the process from planting to packaging that it is free from synthetic chemical products. It also assesses the environmental and social impacts of the activity over the local community (IFOAM).

**IBD – Instituto BioDinâmico – Brasil****IFOAM - International Federation of Organic Agriculture Movements**

- The agroindustrial system is audited on a yearly basis, objecting certify the process from planting to packaging that it is free from synthetic chemical products. It also assesses the



environmental and social impacts of the activity over the local community (Government of Japan).



ICS Japan, Inc. (International Certification Services) – Japão

JAS (Japan Agriculture Standards)

- The agroindustrial system is audited on a yearly basis, objecting certify the process from planting to packaging that it is free from synthetic chemical products. It also assesses the environmental and social impacts of the activity over the local community (European Economic Community).



ECOCERT International França/Alemanha

EEC (European Economic Community)

- The agroindustrial system is audited on a yearly basis, objecting certify the process from planting to packaging that it is free from synthetic chemical products. It also assesses the environmental and social impacts of the activity over the local community (IFOAM - USA).



FVO (Farm Verified Organic) Dakota do Norte – EUA

IFOAM (International Federation of Organic Agriculture Movements)

As a cogeneration process, the project has advantages when compared to conventional thermal processes. Besides of being a renewable energy source, with existing units, plantation and procedures, another positive impact can be addressed to the water collection and utilization. The water consumption is lower, although still necessary for cooling the system. The waste water temperature would be increased on about 7°C, which is lower than the legislation maximum limit, but Bioenergia decided to make an evaporative cooling system which will not only reduce the temperature, but also allow it to use this same water back on the process, dramatically reducing (99%) the volume of water collection needed on the whole system.

One of the biggest impacts of the thermal plants is the particulate emission. One mitigation action to be performed by the project is the control and regulate the boiler, in order to maximize the bagasse burning and to install pollution control equipment, minimizing the emission of such material. After the careful process to remove the particulates from the emission gases (based on the existing legislation and on the higher industrial quality of the group), the remaining emission will not affect the local population. Also, the new boilers are 10% more efficient than the existing units, which will be replaced, resulting on a more efficient burning process and reducing the emission, even not considering the particulate removal procedures.

The project will take actions to reduce the soil contamination risk due to a not proper disposal of solid residues.

As for the noise impact, although the project is located on the rural area, it will follow the existing legislation to limit and control the noise effect to 95 dBA at a 2 meters distance.

Grupo Balbo also supports a reforestation program with native species, not only on deforested areas but also in the form of seedlings to distribute to the local community (90,000 seedlings per year).

One of the most important applications of the process know-how of the group is the mechanical harvesting of the “raw sugarcane” (which means the harvesting process without burning the field before) initiated in 1987. This work resulted on the construction of a specific truck to harvest “raw sugarcane”, in



cooperation with the manufacturer, together with the specification of the whole crop process to support such innovation. The harvesting of “raw sugarcane” has a much better environmental impact, avoiding air pollution, degradation of the soil and a better final energetic yield.

This new production system, eliminating the burning, mechanical harvesting, the biological control of pests, optimization of the industrial process organic residues use as a source of nutrient and also the utilization of the organic fertilizer, made the company eligible to get the large scale sugarcane organic producer certification. It is the major organic agriculture project in the world.

As a result of this innovative work, São Francisco was the first mill in Brazil to get a international certification, provided by the Farm Verified Organic (FVO/IFOAM), USA, by EcoCert International, France and Germany, and by ICS Japan.

Besides the action on the environmental side, Grupo Balbo is also active on the actions to promote of the welfare. In 1980, Grupo Balbo formed a multidisciplinary team to assess the life conditions and health of its employees and families, on a program called “Médico-Social” (Social-Doctor). Both USA and UFRA have today 2,800 employees, and 9,800 people, including their family. Approximately 11,250 people live on houses freely lended by the company, with access to education, leisure and healthcare. In 1987, as a recognition of the program offered by the company, Grupo Balbo was awarded with the “Prêmio Eco” (Eco Prize) of Entrepreneurship Contribution to the Community, offered by the Brazilian branch of the American Chamber of Commerce.

The environmental and social sustainability of Bioenergia is consistent to other activities and programs sponsored by Grupo Balbo, which works on the environmental protection since 1981, such as:

- production of “green sugarcane”;
- production of organic sugar;
- production of organic orange juice and coffee;
- production of biodegradable plastic;
- bio control of pests (reduction of synthetic chemical pesticides).

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

The growing global concern on sustainable use of resources is driving the requirement for more sensitive environmental management practices. Increasingly this is being reflected in governments’ policies and legislation. In Brazil the situation is not different; environmental rules and licensing process policies are very demanding in line with the best international practice.

After the assessment of the preliminary environmental report by the state environmental authority some minor requirements were made in order to issue the licenses. The project sponsors are fulfilling all the requirements. In conclusion the environmental impact of the project activity is not considered significant and no full environmental impact assessment was required.

**SECTION G. Stakeholders' comments****G.1. Brief description how comments by local stakeholders have been invited and compiled**

The Brazilian Designated National Authority, “Comissão Interministerial de Mudanças Globais de Clima”, requests comments by local stakeholders and the validation report issued by an authorized DOE according to the 11th September 2003 resolution # 1 in order to provide the letter of approval.

The proponent of the project sent these letters to the stakeholders in order to invite their comments while the PDD of the project was open for comments in the validation stage in the United Nations Framework Convention on Climate Change “unfccc.int” website since anyone can have access to the mentioned document from a legitimate source.

Comments were sent for the following stakeholders:

- Municipal governments and City Councils;
- State and Municipal Environmental Agencies;
- Environmental Department.
- Brazilian Forum of NGOs and Social Movements for Environment and Development;
- Community Associations
- São Paulo State Public Attorney
- Community associations;

Invitation letters were sent to above mentioned agents in May 2005 (copies of the letters and post office confirmation of receipt communication are available upon request) and no comment was received. The PDD of the project was open for comments in the validation stage in the United Nations Framework Convention on Climate Change website (<http://cdm.unfccc.int/>), since anyone had access to the mentioned document from a legitimate source.

Also, this project was supported by UNDP¹¹, UNCTAD¹² and UNIDO¹³, on the Project GLO/99/H06, “Private Sector Engagement on the CDM Activities”, and because of that there were a ample policy to disclose the information of the project: 1) seminars (city of Campinas, State of São Paulo, on March 19-21, 2003) to inform about the project and the activities to be done; 2) disclosure of information and the documentation of the project to request comments and suggestions from all possible interested parties. Besides that, the UNDP, UNCTAD and UNIDO sites, as well as the ones from Bioenergia and the Climate Change Network (CCN), hosted all the information and documents of the project, given access to such information to interested parties.

Following the law established by CETESB (the environmental agency), Bioenergia has published a public call in a local newspaper informing the issuing of the Construction License, LI (Figure 21).

G.2. Summary of the comments received

¹¹ United Nations Development Programme

¹² United Nations Conference on Trade and Development

¹³ United Nations Industrial Development Organization



Brazilian DNA for the CDM requests project activities to be open for comments prior to validation. Thus, in addition to UNFCCC global stakeholders' comments process, invitation letters were sent to above mentioned agents in May 2005 (copies of the letters and post office confirmation of receipt communication are available upon request) and no comment was received.

No comments were received on the licensing process.

G.3. Report on how due account was taken of any comments received
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Brazilian DNA requests in addition to the UNFCCC global stakeholders' process, that the project participants invite comments from the specific agents mentioned above. The letters were sent in May 2005 (copies of the letters and post office confirmation of receipt communication are available upon request). No comment was received.

**SECTION H. Annexes****Annex 1. Contact information on participants in the project activity****Project Sponsor (CER Seller): Grupo Balbo**

Organization:	Bioenergia Cogeneradora
Street/P.O.Box:	Fazenda Santo Antonio, s/n, 536
City:	Sertãozinho
State/Region:	São Paulo
Postfix/ZIP:	14.177-970
Country:	BRAZIL
Telephone:	+55 (16) 3946-4003
FAX:	+55 (16) 3946-4053
URL:	www.nativealimentos.com.br
Title:	Director
Salutation:	Mr.
Last Name:	Balbo
First Name:	Clésio
Department:	Financial
Personal E-Mail:	clesio@canaverde.com.br

Annex 2. Information regarding public funding

Not applicable

**Annex 3. Baseline Information**

The Brazilian electricity system (figure below) has been historically divided into two subsystems: the North-Northeast (N-NE) and the South-Southeast-Midwest (S-SE-CO, From the Portuguese *Sul-SudEste-Centro-Oeste*). 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):

“... where the Brazilian Electricity System is divided into three separate subsystems:

The South/Southeast/Midwest Interconnected System;

The North/Northeast Interconnected System; and

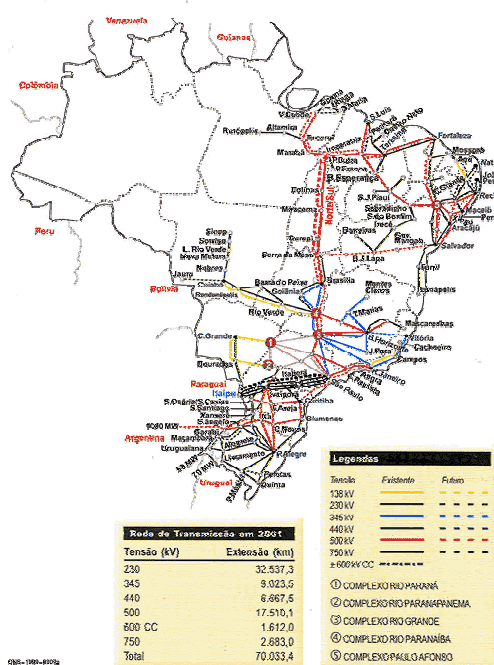
The Isolated Systems (which represent 300 locations that are electrically isolated from the interconnected systems)”

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.’”



Sistema de Transmissão 2001-2003



Brazilian Interconnected System (Source: ONS)

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 to the Brazilian grid. (<http://www.aneel.gov.br/aplicacoes/capacidadebrasil/OperacaoCapacidadeBrasil.asp>). 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 asks project proponents to account for "all generating sources serving the system". In that way, when applying the methodology, 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](http://www.aneel.gov.br/arquivos/PDF/Resumo_Gr%C3%A1ficos_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. 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 from Bosi et al. (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 (Table 10).



Year	$EF_{OM \text{ non-low-cost/must-run}}$ [tCO ₂ /MWh]		EF_{BM} [tCO ₂ /MWh]	
	Ex-ante	Ex-post	Ex-ante	Ex-post
2001-2003	0.719	0.950	0.569	0.096

Table

10 – Ex

ante and ex-post operating and build margin emission factors
(ONS-ADO, 2004; Bosi et al., 2002)

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 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. The figures below show the load duration curves for the three considered years, as well as the lambda calculated.

Emission factors for the Brazilian South-Southeast-Midwest interconnected grid				
Baseline (including imports)	EF_{OM} [tCO ₂ /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
	$EF_{OM, \text{ simple-adjusted}}$ [tCO ₂ /MWh]	$EF_{BM, 2004}$	Lambda	
	0.4310	0.1256	λ_{2002}	
	Alternative weights	Default weights	0.5053	
	$w_{OM} = 0.75$	$w_{OM} = 0.5$	λ_{2003}	
	$w_{BM} = 0.25$	$w_{BM} = 0.5$	0.5312	
	EF_{CM} [tCO ₂ /MWh]	Default EF_{OM} [tCO ₂ /MWh]	λ_{2004}	
	0.3547	0.2783	0.5041	

Table 3 – Emission factors for the Brazilian South-Southeast-Midwest interconnected grid (simple adjusted operating margin factor)

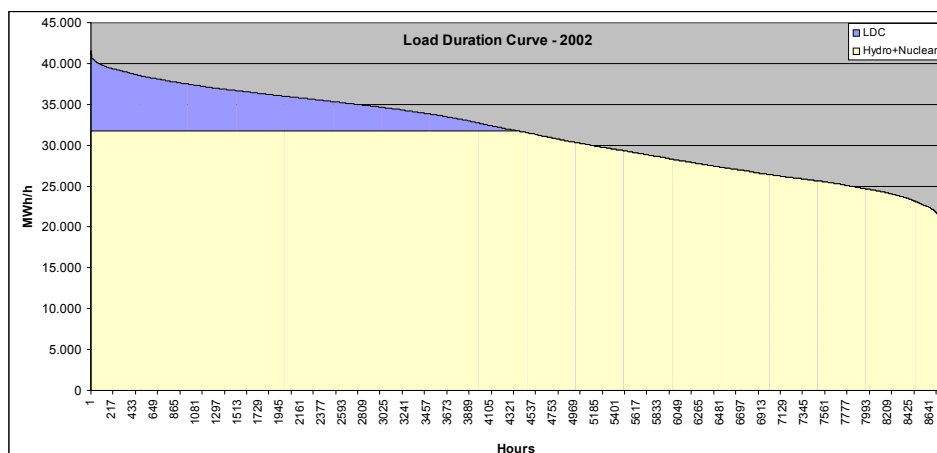


Figure 18 – Load duration curve for the S-SE-CO system, 2002

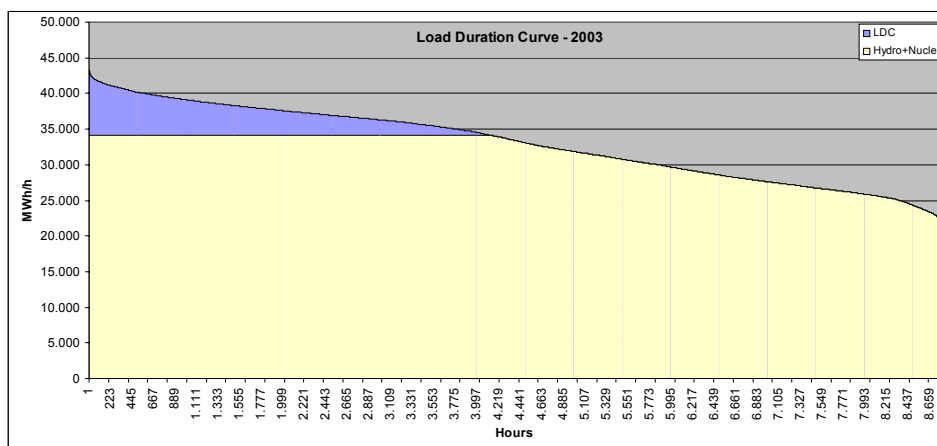


Figure 19 – Load duration curve for the S-SE-CO system, 2003

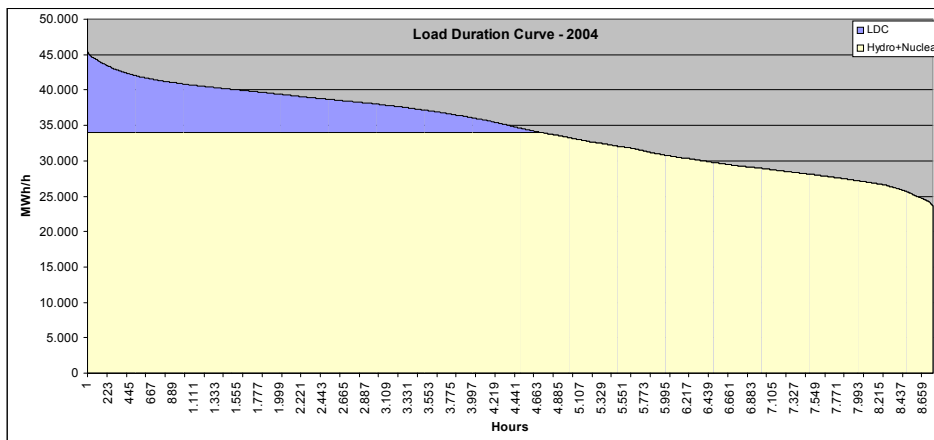


Figure 20 – Load duration curve for the S-SE-CO system, 2004



	Subsystem*	Fuel source**	Power plant	Operation start [2, 4, 5]	Installed capacity (MW) [1]	Fuel conversion efficiency (%) [2]	Carbon emission factor (tCO ₂ /t) [3]	Fraction carbon oxidized [3]	Emission factor (tCO ₂ /MWh)
1	S-SE-CO	H	Jauru	Sep-2003	121.5	1	0.0	0.0%	0.000
2	S-SE-CO	H	Gaúporé	Sep-2003	120.0	1	0.0	0.0%	0.000
3	S-SE-CO	G	Três Lagoas	Aug-2003	366.0	0.3	15.3	99.5%	0.670
4	S-SE-CO	H	Furni (MG)	Jan-2003	150.0	1	0.0	0.0%	0.000
5	S-SE-CO	H	Itaipua I	Sep-2002	156.1	1	0.0	0.0%	0.000
6	S-SE-CO	G	Araucária	Sep-2002	464.5	0.3	15.3	99.5%	0.670
7	S-SE-CO	G	Canas	Sep-2002	160.6	0.3	15.3	99.5%	0.670
8	S-SE-CO	H	Piraju	Sep-2002	51.0	1	0.0	0.0%	0.000
9	S-SE-CO	G	Nova Piratininga	Jun-2002	384.9	0.3	15.3	99.5%	0.670
10	S-SE-CO	O	PCT CGTEE	Jun-2002	5.0	0.3	20.7	99.0%	0.902
11	S-SE-CO	H	Rosai	Jun-2002	55.0	1	0.0	0.0%	0.000
12	S-SE-CO	G	Ibitiré	May-2002	226.0	0.3	15.3	99.5%	0.670
13	S-SE-CO	H	Cama Brava	Jan-2002	465.9	1	0.0	0.0%	0.000
14	S-SE-CO	H	Sta. Clara	Jan-2002	60.0	1	0.0	0.0%	0.000
15	S-SE-CO	H	Machadinho	Jan-2002	1,140.0	1	0.0	0.0%	0.000
16	S-SE-CO	G	Juiz de Fora	Nov-2001	87.0	0.28	15.3	99.5%	0.718
17	S-SE-CO	G	Macaé Merchant	Nov-2001	622.6	0.24	15.3	99.5%	0.837
18	S-SE-CO	H	Lajeado (ANEEL res. 402/2001)	Nov-2001	962.5	1	0.0	0.0%	0.000
19	S-SE-CO	G	Eletrobrás	Oct-2001	379.0	0.24	15.3	99.5%	0.837
20	S-SE-CO	H	Porto Estrela	Sep-2001	112.0	1	0.0	0.0%	0.000
21	S-SE-CO	G	Cuiabá (Mario Covas)	Aug-2001	529.2	0.3	15.3	99.5%	0.670
22	S-SE-CO	G	W. Arjona	Jan-2001	194.0	0.25	15.3	99.5%	0.804
23	S-SE-CO	G	Uniquiliana	Jan-2000	639.0	0.45	15.3	99.5%	0.447
24	S-SE-CO	H	S. Caxias	Jan-1999	1,240.0	1	0.0	0.0%	0.000
25	S-SE-CO	H	Canas I	Jan-1999	82.5	1	0.0	0.0%	0.000
26	S-SE-CO	H	Canas II	Jan-1999	72.0	1	0.0	0.0%	0.000
27	S-SE-CO	H	Igarapava	Jan-1999	210.0	1	0.0	0.0%	0.000
28	S-SE-CO	H	Porto Primavera	Jan-1999	1,540.0	1	0.0	0.0%	0.000
29	S-SE-CO	D	Cuiabá (Mario Covas)	Oct-1998	529.2	0.27	20.2	99.0%	0.978
30	S-SE-CO	H	Sobagi	Sep-1998	60.0	1	0.0	0.0%	0.000
31	S-SE-CO	H	PCH EMAE	Jan-1998	26.0	1	0.0	0.0%	0.000
32	S-SE-CO	H	PCH CEE	Jan-1998	25.0	1	0.0	0.0%	0.000
33	S-SE-CO	H	PCH ENERSUL	Jan-1998	43.0	1	0.0	0.0%	0.000
34	S-SE-CO	H	PCH CEB	Jan-1998	15.0	1	0.0	0.0%	0.000
35	S-SE-CO	H	PCH ESCELSA	Jan-1998	62.0	1	0.0	0.0%	0.000
36	S-SE-CO	H	PCH CELESC	Jan-1998	50.0	1	0.0	0.0%	0.000
37	S-SE-CO	H	PCH CEMAT	Jan-1998	145.0	1	0.0	0.0%	0.000
38	S-SE-CO	H	PCH CELG	Jan-1998	15.0	1	0.0	0.0%	0.000
39	S-SE-CO	H	PCH CERJ	Jan-1998	59.0	1	0.0	0.0%	0.000
40	S-SE-CO	H	PCH COPEL	Jan-1998	70.0	1	0.0	0.0%	0.000
41	S-SE-CO	H	PCH CEMIG	Jan-1998	84.0	1	0.0	0.0%	0.000
42	S-SE-CO	H	PCH CPFL	Jan-1998	55.0	1	0.0	0.0%	0.000
43	S-SE-CO	H	S. Mesa	Jan-1998	1,275.0	1	0.0	0.0%	0.000
44	S-SE-CO	H	PCH EPAULO	Jan-1998	26.0	1	0.0	0.0%	0.000
45	S-SE-CO	H	Guilim Amorm	Jan-1997	140.0	1	0.0	0.0%	0.000
46	S-SE-CO	H	Corumbá	Jan-1997	375.0	1	0.0	0.0%	0.000
47	S-SE-CO	H	Miranda	Jan-1997	408.0	1	0.0	0.0%	0.000
48	S-SE-CO	H	Noav Ponte	Jan-1994	510.0	1	0.0	0.0%	0.000
49	S-SE-CO	H	Segredo (Gov. Ney Braga)	Jan-1992	1,260.0	1	0.0	0.0%	0.000
50	S-SE-CO	H	Taguarucu	Jan-1989	554.0	1	0.0	0.0%	0.000
51	S-SE-CO	H	Manso	Jan-1988	210.0	1	0.0	0.0%	0.000
52	S-SE-CO	H	D. Francisca	Jan-1987	125.0	1	0.0	0.0%	0.000
53	S-SE-CO	H	Ita	Jan-1987	1,450.0	1	0.0	0.0%	0.000
54	S-SE-CO	H	Rosana	Jan-1987	369.2	1	0.0	0.0%	0.000
55	S-SE-CO	N	Angra	Jan-1985	1,874.0	1	0.0	0.0%	0.000
56	S-SE-CO	H	T. Imbuá	Jan-1985	807.5	1	0.0	0.0%	0.000
57	S-SE-CO	H	Itaipu 60 Hz	Jan-1983	6,300.0	1	0.0	0.0%	0.000
58	S-SE-CO	H	Itaipu 50 Hz	Jan-1983	5,375.0	1	0.0	0.0%	0.000
59	S-SE-CO	H	Emborcação	Jan-1982	1,192.0	1	0.0	0.0%	0.000
60	S-SE-CO	H	Nova Avanhandava	Jan-1982	347.4	1	0.0	0.0%	0.000
61	S-SE-CO	H	Gov. Bento Munhoz - GBM	Jan-1980	1,676.0	1	0.0	0.0%	0.000

* Subsystem: S - south, SE-CO - Southeast-Midwest

** Fuel source: C, bituminous coal; D, diesel oil; G, natural gas; H, hydro; N, nuclear; O, residual fuel oil.

[1] Agência Nacional de Energia Elétrica. Banco de Informações de Geração (<http://www.aneel.gov.br>), data collected in november 2004.

[2] Bosi, M., A. Laurence, P. Maldonado, R. Schaeffer, A.F. Simoes, H. Winkler and J.M. Lukamba. Road testing baselines for GHG mitigation projects in the electric power sector. OECD/IEA information paper, October 2002.

[3] Intergovernmental Panel on Climate Change. Revised 1996 Guidelines for National Greenhouse Gas Inventories.

[4] Operador Nacional do Sistema Elétrico. Centro Nacional de Operação do Sistema. Acompanhamento Diário da Operação do SIN (daily reports from Jan. 1, 2001 to Dec. 31, 2003).

[5] Agência Nacional de Energia Elétrica. Superintendência dos Serviços de Geração. Resumo Geral dos Novos Empreendimentos de Geração (<http://www.aneel.gov.br>), data collected in november 2004.

Table 11 – Power plants database for the Brazilian South-Southeast-Midwest interconnected grid, part 1



CDM – Executive Board

page 46/62

	Subsystem*	Fuel source**	Power plant	Operation start [2, 4, 5]	Installed capacity (MW) [1]	Fuel conversion efficiency (%) [2]	Carbon emission factor (tCO ₂ /tJ) [3]	Fraction carbon oxidized [3]	Emission factor (tCO ₂ /MWh)
62	S-SE-CO	H	S. Santiago	Jan-1980	1,420.0	1	0.0	0.0%	0.000
63	S-SE-CO	H	Itumbiara	Jan-1980	2,280.0	1	0.0	0.0%	0.000
64	S-SE-CO	O	Igarapé	Jan-1978	131.0	0.3	20.7	99.0%	0.902
65	S-SE-CO	H	Itauba	Jan-1978	512.4	1	0.0	0.0%	0.000
66	S-SE-CO	H	A. Vermelha (Jose E. Moraes)	Jan-1978	1,396.2	1	0.0	0.0%	0.000
67	S-SE-CO	H	S. Simão	Jan-1978	1,710.0	1	0.0	0.0%	0.000
68	S-SE-CO	H	Capivara	Jan-1977	640.0	1	0.0	0.0%	0.000
69	S-SE-CO	H	S. Osório	Jan-1975	1,078.0	1	0.0	0.0%	0.000
70	S-SE-CO	H	Marimbondo	Jan-1975	1,440.0	1	0.0	0.0%	0.000
71	S-SE-CO	H	Promissão	Jan-1975	264.0	1	0.0	0.0%	0.000
72	S-SE-CO	C	Pres. Medici	Jan-1974	446.0	0.26	26.0	98.0%	1.294
73	S-SE-CO	H	Volta Grande	Jan-1974	380.0	1	0.0	0.0%	0.000
74	S-SE-CO	H	Porto Colombia	Jan-1973	320.0	1	0.0	0.0%	0.000
75	S-SE-CO	H	Passo Fundo	Jan-1973	158.0	1	0.0	0.0%	0.000
76	S-SE-CO	H	Passo Real	Jan-1973	158.0	1	0.0	0.0%	0.000
77	S-SE-CO	H	Ilha Solteira	Jan-1973	3,444.0	1	0.0	0.0%	0.000
78	S-SE-CO	H	Mascarenhas	Jan-1973	131.0	1	0.0	0.0%	0.000
79	S-SE-CO	H	Gov. Parigot de Souza - GPS	Jan-1971	252.0	1	0.0	0.0%	0.000
80	S-SE-CO	H	Chavantes	Jan-1971	414.0	1	0.0	0.0%	0.000
81	S-SE-CO	H	Jaguara	Jan-1971	424.0	1	0.0	0.0%	0.000
82	S-SE-CO	H	Sá Carvalho	Apr-1970	78.0	1	0.0	0.0%	0.000
83	S-SE-CO	H	Estreito (Luiz Carlos Barreto)	Jan-1969	1,050.0	1	0.0	0.0%	0.000
84	S-SE-CO	H	Ibitinga	Jan-1969	131.5	1	0.0	0.0%	0.000
85	S-SE-CO	H	Jupia	Jan-1969	1,551.2	1	0.0	0.0%	0.000
86	S-SE-CO	O	Alegrete	Jan-1968	66.0	0.26	20.7	99.0%	1.040
87	S-SE-CO	G	Campos (Roberto Silveira)	Jan-1968	30.0	0.24	15.3	99.5%	0.837
88	S-SE-CO	G	Santa Cruz (RJ)	Jan-1968	766.0	0.31	15.3	99.5%	0.648
89	S-SE-CO	H	Parabuna	Jan-1968	85.0	1	0.0	0.0%	0.000
90	S-SE-CO	H	Umuirô (Armando Salles de Oliveira)	Jan-1967	32.0	1	0.0	0.0%	0.000
91	S-SE-CO	H	Caconde	Jan-1966	80.4	1	0.0	0.0%	0.000
92	S-SE-CO	C	J. Lacerda C	Jan-1965	363.0	0.25	26.0	98.0%	1.345
93	S-SE-CO	C	J. Lacerda B	Jan-1965	262.0	0.21	26.0	98.0%	1.602
94	S-SE-CO	C	J. Lacerda A	Jan-1965	232.0	0.18	26.0	98.0%	1.869
95	S-SE-CO	H	Bariri (Alvaro de Souza Lima)	Jan-1965	143.1	1	0.0	0.0%	0.000
96	S-SE-CO	H	Funil (RJ)	Jan-1965	216.0	1	0.0	0.0%	0.000
97	S-SE-CO	C	Figueira	Jan-1963	20.0	0.3	26.0	98.0%	1.121
98	S-SE-CO	H	Furnas	Jan-1963	1,216.0	1	0.0	0.0%	0.000
99	S-SE-CO	H	Barra Bonita	Jan-1963	140.8	1	0.0	0.0%	0.000
100	S-SE-CO	C	Charqueadas	Jan-1962	72.0	0.23	26.0	98.0%	1.462
101	S-SE-CO	H	Jurumirim (Armando A. Laydner)	Jan-1962	97.7	1	0.0	0.0%	0.000
102	S-SE-CO	H	Jacui	Jan-1962	180.0	1	0.0	0.0%	0.000
103	S-SE-CO	H	Pereira Passos	Jan-1962	99.1	1	0.0	0.0%	0.000
104	S-SE-CO	H	Tres Marias	Jan-1962	396.0	1	0.0	0.0%	0.000
105	S-SE-CO	H	Euclides da Cunha	Jan-1960	108.8	1	0.0	0.0%	0.000
106	S-SE-CO	H	Camargos	Jan-1960	48.0	1	0.0	0.0%	0.000
107	S-SE-CO	H	Santa Branca	Jan-1960	56.1	1	0.0	0.0%	0.000
108	S-SE-CO	H	Cachoeira Dourada	Jan-1959	658.0	1	0.0	0.0%	0.000
109	S-SE-CO	H	Salto Grande (Lucas N. Garcez)	Jan-1958	70.0	1	0.0	0.0%	0.000
110	S-SE-CO	H	Salto Grande (MG)	Jan-1956	102.0	1	0.0	0.0%	0.000
111	S-SE-CO	H	Mascarenhas de Moraes (Peixoto)	Jan-1956	478.0	1	0.0	0.0%	0.000
112	S-SE-CO	H	Itutinga	Jan-1955	52.0	1	0.0	0.0%	0.000
113	S-SE-CO	C	S. Jerônimo	Jan-1954	20.0	0.26	26.0	98.0%	1.294
114	S-SE-CO	O	Caroba	Jan-1954	36.2	0.3	20.7	99.0%	0.902
115	S-SE-CO	O	Piratininga	Jan-1954	472.0	0.3	20.7	99.0%	0.902
116	S-SE-CO	H	Canastra	Jan-1953	42.5	1	0.0	0.0%	0.000
117	S-SE-CO	H	Nilo Peçanha	Jan-1953	378.4	1	0.0	0.0%	0.000
118	S-SE-CO	H	Fontes Nova	Jan-1940	130.3	1	0.0	0.0%	0.000
119	S-SE-CO	H	Henry Borden Sub.	Jan-1926	420.0	1	0.0	0.0%	0.000
120	S-SE-CO	H	Henry Borden Ext.	Jan-1926	469.0	1	0.0	0.0%	0.000
121	S-SE-CO	H	I. Pombos	Jan-1924	189.7	1	0.0	0.0%	0.000
122	S-SE-CO	H	Jaguari	Jan-1917	11.8	1	0.0	0.0%	0.000
Total (MW) =					64,478.6				
* Subsystem: S - south, SE-CO - Southeast-Midwest									
** Fuel source (C, bituminous coal; D, diesel oil; G, natural gas; H, hydro; N, nuclear; O, residual fuel oil).									
[1] Agência Nacional de Energia Elétrica, Banco de Informações da Geração (http://www.aneel.gov.br/), data collected in november 2004).									
[2] Bosi, M., A. Laurence, P. Maldonado, R. Schaeffer, A.F. Simoes, H. Winkler and J.M. Lukamba, Road testing baselines for GHG mitigation projects in the electric power sector. OECD/IEA information paper, October 2002.									
[3] Intergovernmental Panel on Climate Change, Revised 1996 Guidelines for National Greenhouse Gas Inventories.									
[4] Operador Nacional do Sistema Elétrico, Centro Nacional de Operação do Sistema, Acompanhamento Diário da Operação do SIN (daily reports from Jan. 1, 2001 to Dec. 31, 2003).									
[5] Agência Nacional de Energia Elétrica, Superintendência de Fiscalização dos Serviços de Geração, Resumo Geral dos Novos Empreendimentos de Geração (http://www.aneel.gov.br/), data collected in november 2004).									

Table 12 – Power plants database for the Brazilian South-Southeast-Midwest interconnected grid, part 2



Annex 4 – Monitoring Plan

As per the procedures set by the Approved monitoring methodology AM0015: “Monitoring methodology for emissions reductions from grid connected bagasse cogeneration projects”

The project sponsor will proceed with the necessary measures for the power control and monitoring. Together with the information produced by both ANEEL and ONS, it will be possible to monitor the power generation of the project and the grid power mix.



Annex 5 - Figures

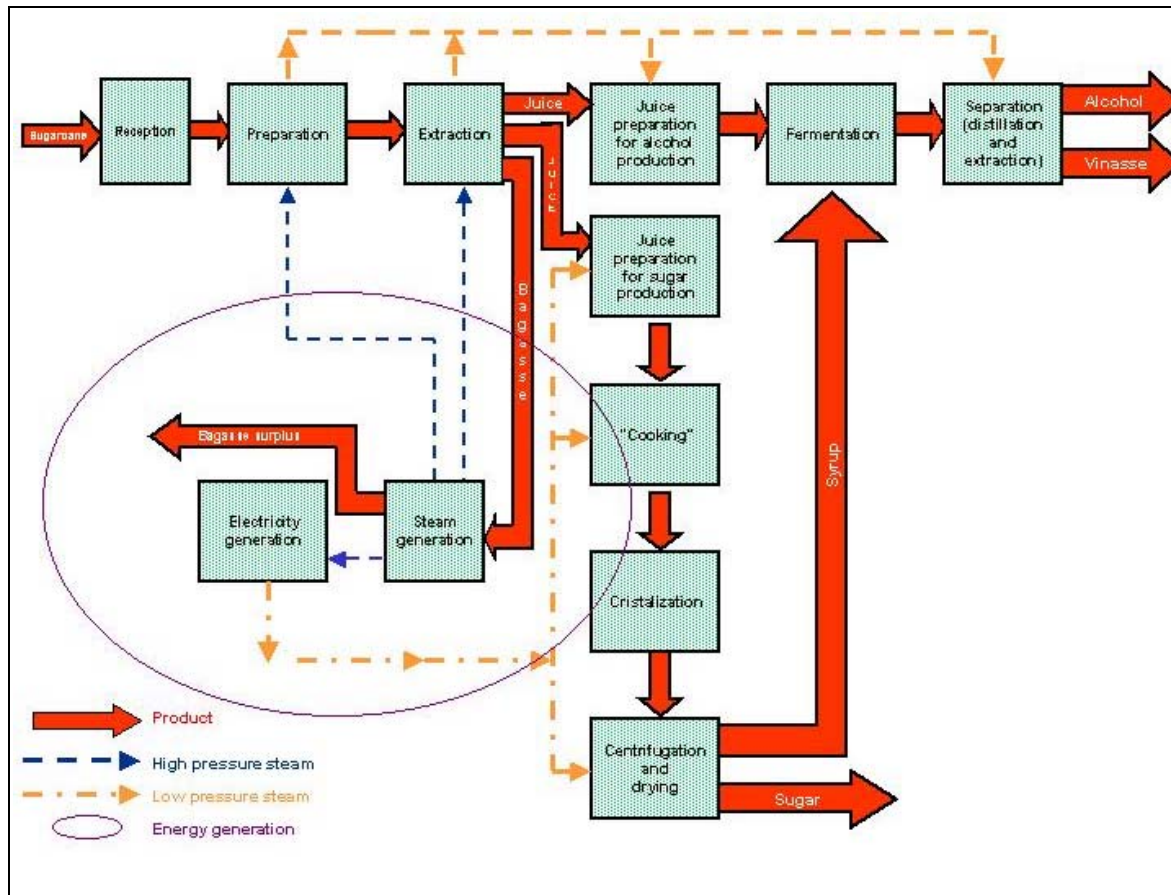


Figure 2 - Flowchart of the electricity generation inside a Sugar and Alcohol Production (Source: Codistil)

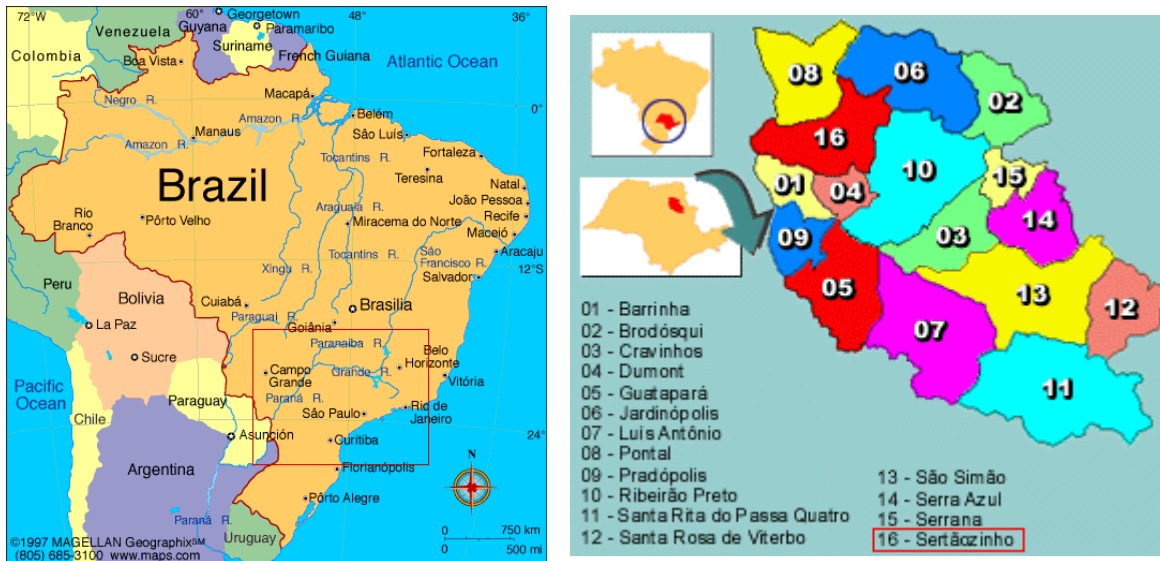


Figure 3 - Santo Antônio Sugarcane Mill - Aerial Overview (Source: Company)

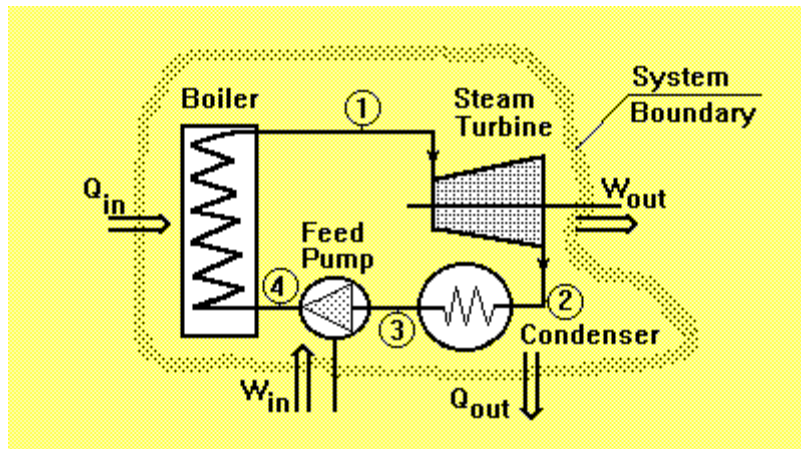


Figure 4 - Rankine Cycle (Source: Taftan Data, 1998)



Figure 5 -Bioenergia Power Plant

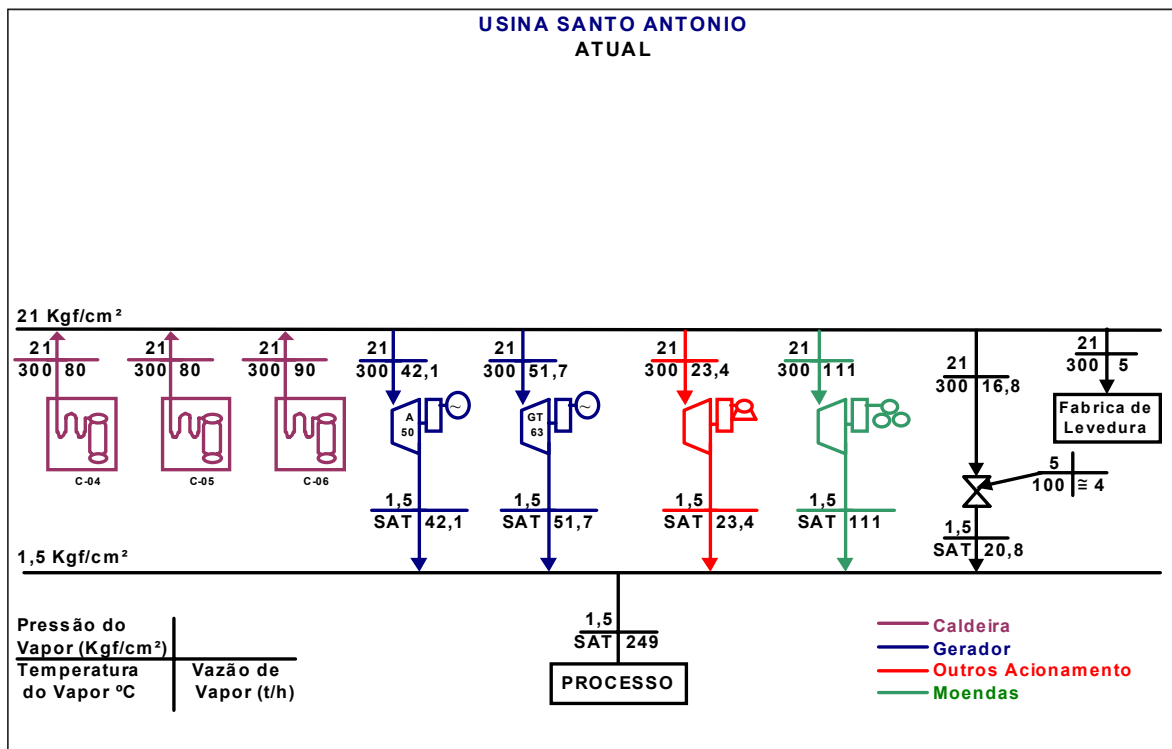


Figure 6 – UTE Usina Santo Antonio old configuration

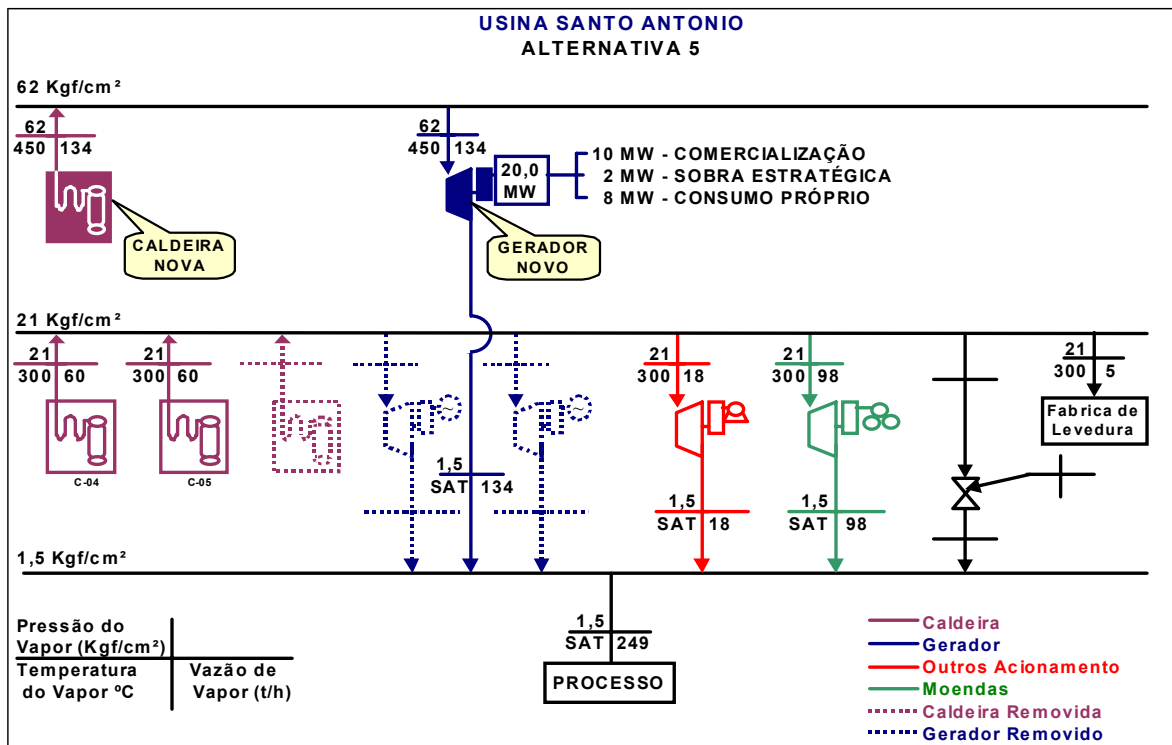


Figure 7 – UTE Usina Santo Antonio current configuration

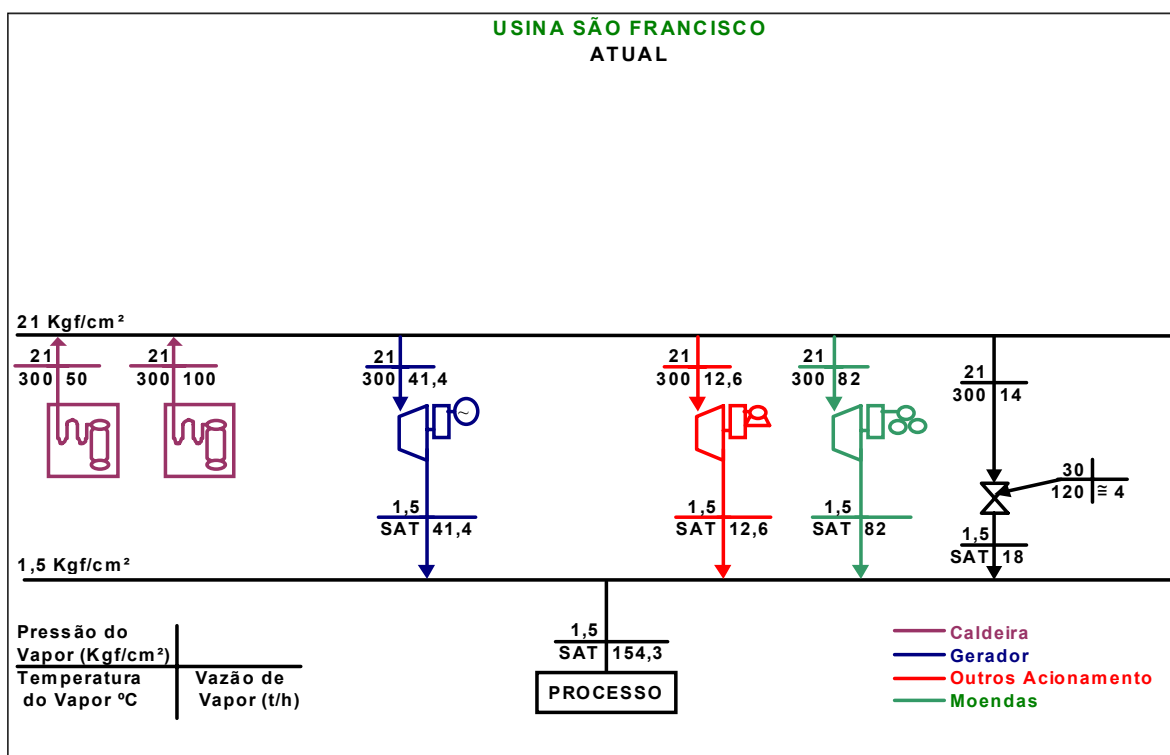


Figure 8 – UTE Usina São Francisco old configuration

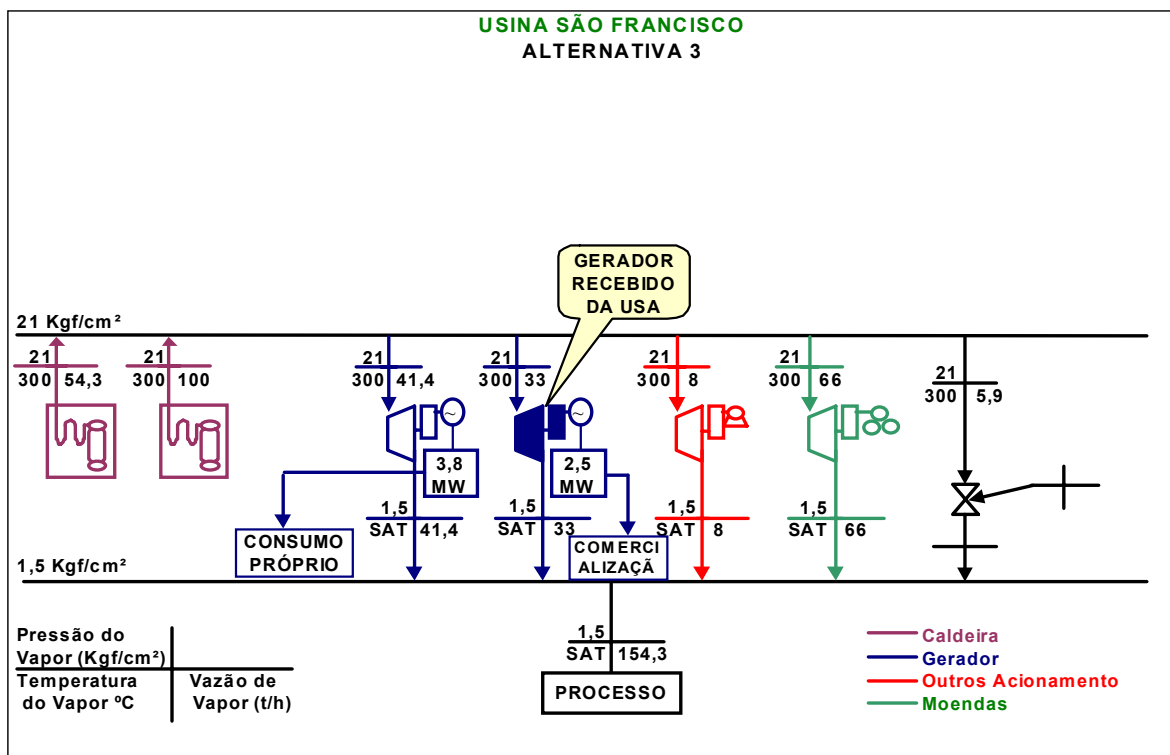


Figure 9 – UTE Usina São Francisco current configuration

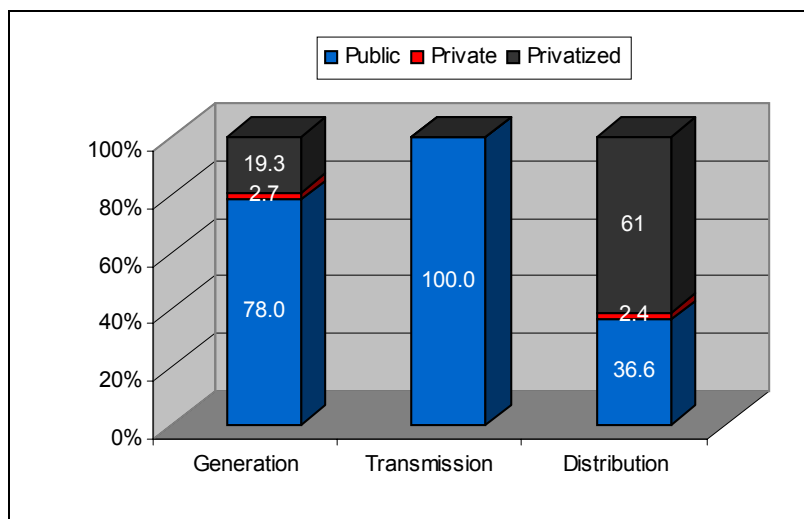


Figure 10 - Participation of private capital in the Brazilian electricity market in December 2000 (Source: BNDES, 2000).

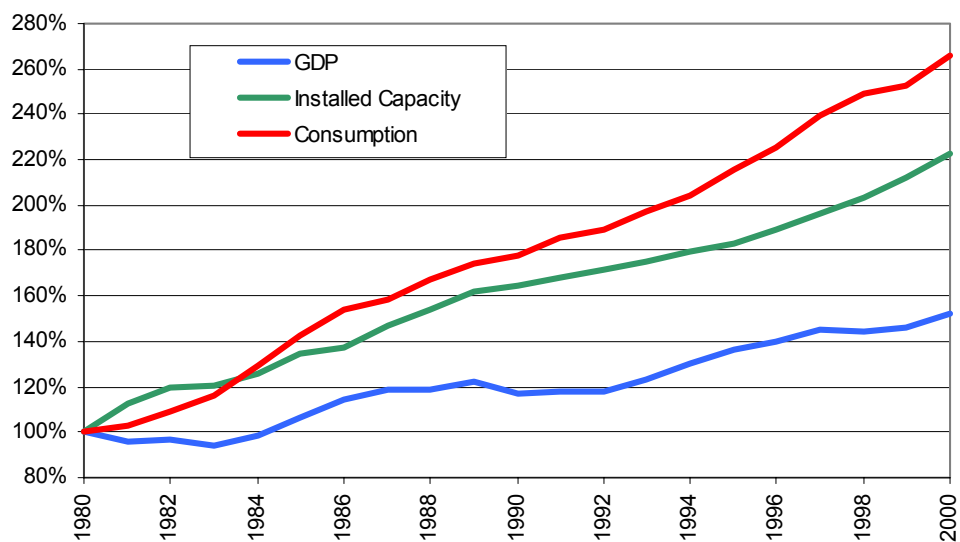


Figure 11 - Cumulated variation of GDP, electricity supply (installed capacity) and demand (consumption). Source: Eletrobrás, IBGE.

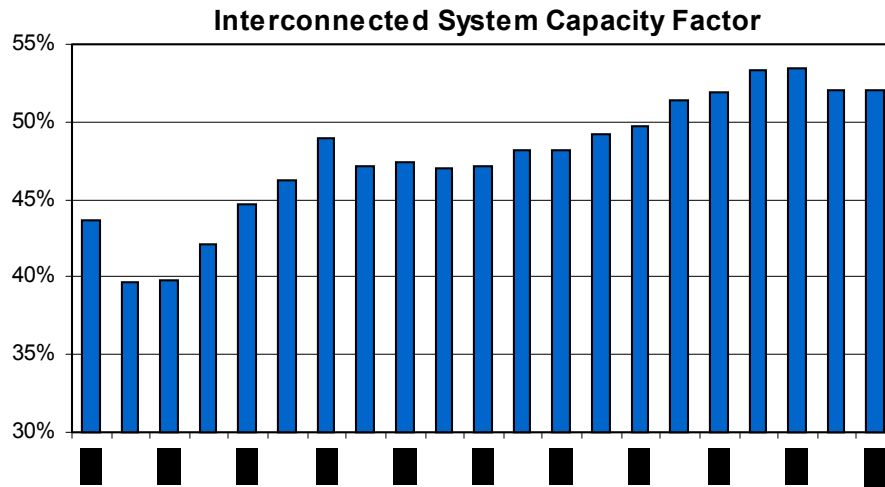


Figure 12 - Evolution of the rate of generated energy to installed capacity (Source: Eletrobrás).

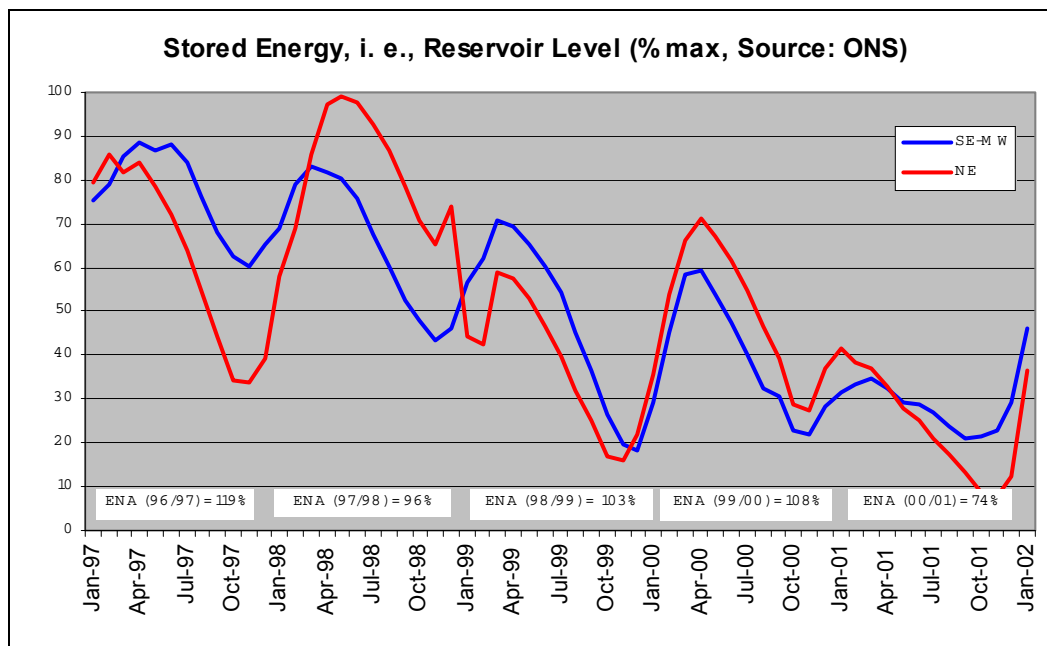


Figure 13 - Evolution of the water stored capacity for the Southeast/Midwest (SE-MW) and Northeast (NE) interconnected subsystems and intensity of precipitation in the rainy season (ENA) in the southeast region compared to the historic average (Source: ONS).

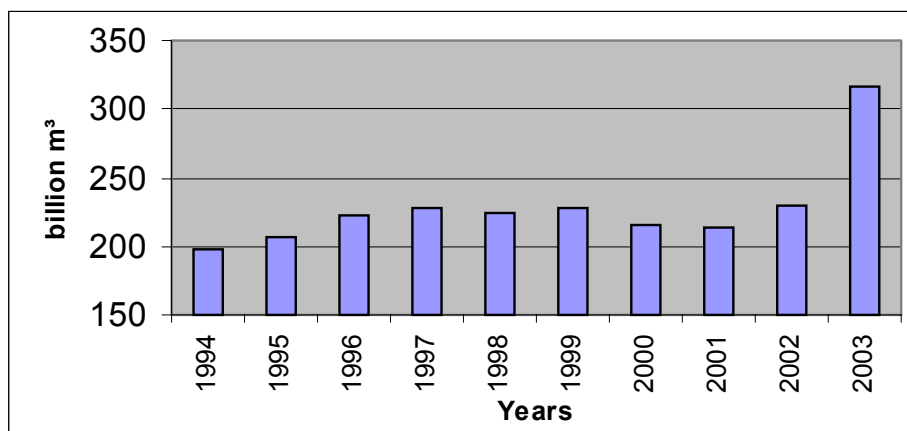


Figure 14 - National Historical Proved Reserves of Natural Gas (Source: Petrobras)

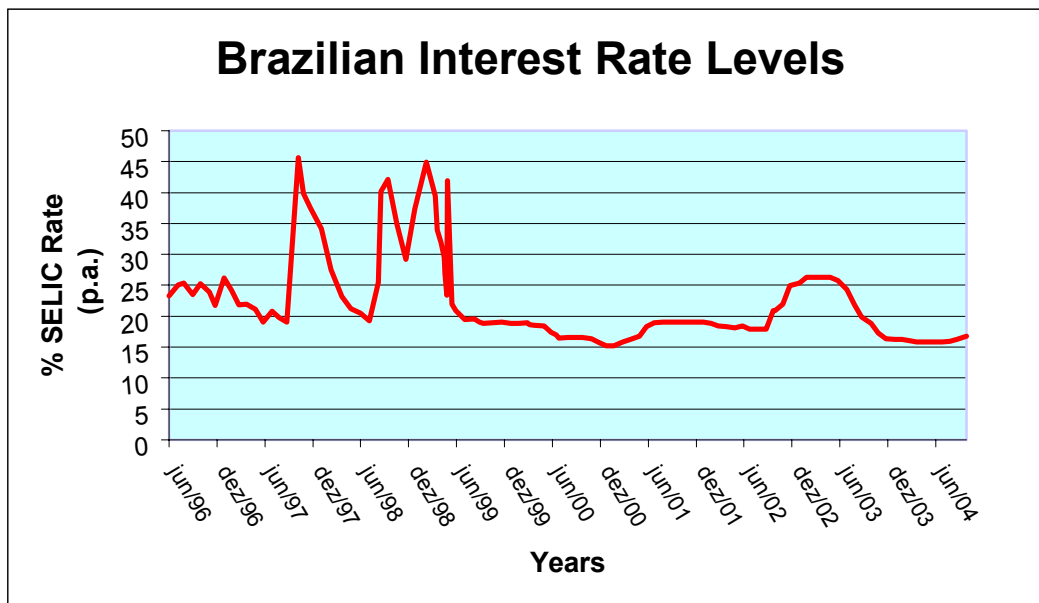


Figure 15 - SELIC rate (source: Banco Central do Brasil)

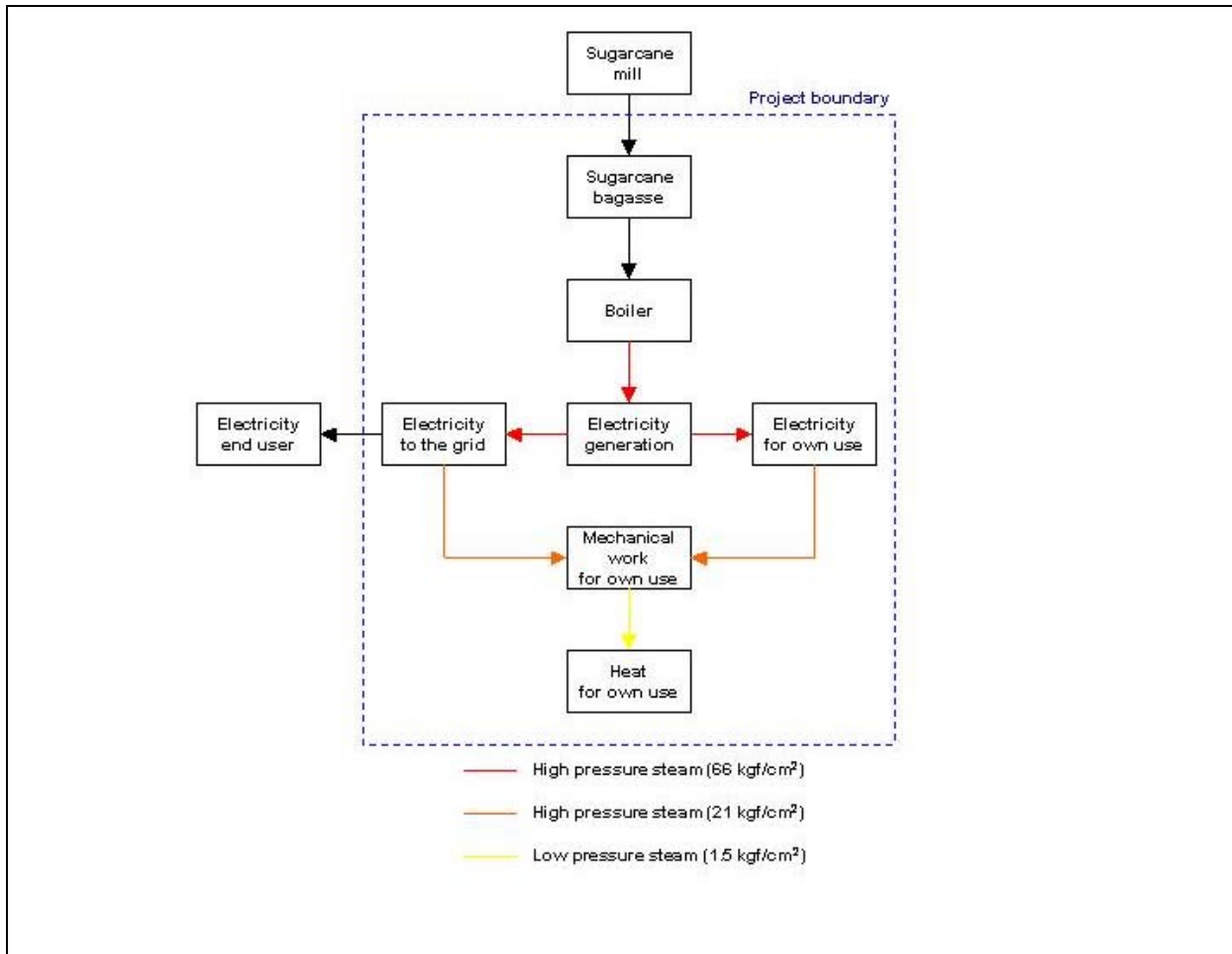


Figure 16 – Flowchart of the Project Boundaries



Horizonte 2006



Figure 17 - Brazilian Interconnected System (Source: ONS, <http://www.ons.org.br/>)

GOVERNO DO ESTADO DE SÃO PAULO
SECRETARIA DE ESTADO DO MEIO AMBIENTE

LICENÇA AMBIENTAL DE INSTALAÇÃO

Nº 00229

PROCESSO SMA

Nº 13569/2001

A Secretaria do Meio Ambiente do Estado de São Paulo - SMA, no uso das atribuições que lhe confere a Lei Federal 6938, de 31 de agosto de 1981, que dispõe sobre a Política Nacional do Meio Ambiente, regulamentada pelo Decreto Federal 99.274, de 06 de junho de 1990, e demais normas pertinentes, emite a presente **Licença Ambiental de Instalação**, com base no Parecer Técnico CPRN/DAIA/185/2002 e na Licença Ambiental Prévia nº 00453, para:

IDENTIFICAÇÃO DO EMPREENDEDOR

RAZÃO SOCIAL: BIOENERGIA COGERADORA LTDA.

CNPJ: 71.324.784/0001-51

LOGRADOURO: FAZENDA SANTO ANTONIO

BAIRRO: BAIRRO DO CAMPINHO

MUNICÍPIO: SERTÃOZINHO

CEP: 14160-000

IDENTIFICAÇÃO DO EMPREENDIMENTO

NOME: USINA TERMOELÉTRICA DE COGERAÇÃO "UTE SANTO ANTONIO"

LOGRADOURO: FAZENDA SANTO ANTONIO

MUNICÍPIO(S): SERTÃOZINHO

CARACTERIZAÇÃO DO EMPREENDIMENTO

DESCRIÇÃO: USINA TERMOELÉTRICA DE COGERAÇÃO COM POTÊNCIA NOMINAL DE 25 MW

OBSERVAÇÕES

- a) A presente Licença Ambiental de Instalação deverá permanecer no local do empreendimento.
- b) Previamente à operação do empreendimento deverá ser obtida a Licença Ambiental de Operação, sob pena de aplicação das penalidades previstas na legislação em vigor.
- c) A Licença Ambiental de Operação somente será concedida após o cumprimento das exigências relacionadas neste documento.
- d) A presente Licença Ambiental de Instalação não dispensa nem substitui quaisquer alvarás, licenças, autorizações ou certidões de qualquer natureza, exigidos pela legislação federal, estadual ou municipal, bem como não significa reconhecimento de qualquer direito de propriedade.
- e) Integra(m) a presente Licença 01 anexo(s).
- f) O prazo de validade desta Licença Ambiental de Instalação é de 01 (hum) ano(s), a contar da data de sua emissão.

O presente documento foi emitido sem rasura e/ou colagem

USO DA COORDENADORIA DE LICENCIAMENTO AMBIENTAL E DE PROTEÇÃO DE RECURSOS NATURAIS

Data: 27/11/02

JOSE GOLDEMBERG - Secretário de Estado

Figure 21 – Construction License

**Annex 5 – Tables**

Season	Sugarcane Produced	Bagasse Produced
1995/96	2,238,761.920	604,465.72
1996/97	2,783,352.050	751,505.05
1997/98	2,843,629.690	767,780.02
1998/99	3,020,974.000	815,662.98
1999/00	2,934,456.010	792,303.12
2000/01	2,424,076.690	654,500.71
2001/02	2,773,868.890	748,944.60
2002/03	2,822,778.950	762,150.32
2003/04	2,935,371.290	792,550.25
2004/05 (*)	3,186,000.000	860,220.00

(*) Forecast in tonnes

Table 3 - Historical Bagasse Generation of Balbo sugarcane mills

Financial Sensitivity Analysis - Bioenergia			
SELIC rate* (1996 - 2004)	%	Project NPV	Project NPV with CER
Maximum Level	45,00%	(R\$ 11.031.467)	(R\$ 10.219.757)
Average	22,36%	(R\$ 3.571.489)	(R\$ 1.668.722)
Minimum Level	15,25%	R\$ 4.067.619	R\$ 6.906.498
Current Discount Rate	17,00%	R\$ 1.660.043	R\$ 4.209.156
Project IRR		18,42%	20,54%

* The SELIC rate was created in 1996.

Table 5 – Bioenergia Financial Sensitivity Analysis

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