

Comments on VN_PM002 “Waste heat recovery for electricity generation”

Proposed methodology form

- Cover sheet, sectoral scope:
 - As this methodology involves electricity generation, the sectoral scope for this proposed methodology is “1. Energy industries”.
- A. Title of the methodology:
 - Title of the methodology is ambiguous and it does not reflect the project types to which the methodology is applicable as the term “Waste heat generation facility” may be interpreted in different ways (Please refer the comment on B. as below).
- B. Terms and definitions:
 - General terms such as a “TPE” are not necessary to be listed up.
 - The term “Waste heat generation facility” is not sufficiently explicit as it may be interpreted in different ways (e.g. in an iron and steel factory, this can mean a “coke oven” which produces red hot coke, a source of waste heat, or a “cooling chamber” of a CDQ where waste heat being actualized) and may cause confusion among users of the methodology.
- C. Summary of the methodology:
 - The summary of the “GHG emission reduction measures” is not sufficiently explicit as the generation of electricity itself does not necessarily mean the GHG emission reductions..
- D. Eligibility criteria:
 - “Should” is used to indicate that among several possibilities, one course of action is recommended as particularly suitable and is not appropriate to be included in the criterion. In addition, because some phrases used in the criteria (e.g. “a new initiative”, “Implementation of the project activity”, “adequate”, “a single-cycle power plant”) are not sufficiently explicit, the criteria as a whole cannot be examined objectively. Duplication among the criteria is identified (i.a. Criterion 2 and 4). If the methodology assumes the cases in which the recipient facility uses only grid electricity before a project implementation, and the auxiliary equipment in the project facility uses only the electricity generated by the project activity without importing grid electricity, these conditions are necessary to be included as criteria.
- F.1. Establishment and calculation of reference emissions
 - As it is not fully clear that the methodology assumes the cases where the recipient facility uses only grid electricity before a project implementation, assuming that the transmission loss to be 0 is not necessarily determined as conservative. Also, there are unclear expressions which cause ambiguity of the methodology.
- G. Calculation of project emissions

- While the methodology mentions “The amount of auxiliary electricity consumption will have been deducted before the determination of the amount of electricity provided to the recipient facility”, it is not sufficiently explicit how such amount is measured or calculated.
- I. Data and parameters fixed *ex ante*
 - The parameters are not sufficiently explicit as how to determine $EF_{\text{Elec,gr,y}}$ is not detailed (e.g. the name of organization) and how to calculate $Q_{\text{QE,BL}}$ is not instructed.

Proposed Methodology Spreadsheet

- Calculation Process Sheet:
 - Cell G19 (or G14): The formula in this cell does not express the condition written in the F.2. of the Proposed methodology form, as the methodology states “The values of f_{cap} is 1 if the ratio calculated pursuant to Equation 2 is the same or greater than 1”.