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# Determination Report

*SC OVIDIU DEVELOPMENT S.R.L.*

DETERMINATION OF THE JI TRACK 1 PROJECT:  
*COGEALAC WIND POWER PROJECT*

REPORT No. 600500459

**12 January 2011**

TÜV SÜD Industrie Service GmbH  
Carbon Management Service  
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<b>Subject:</b> Determination of the JI track 1 Project <i>Cogealac Wind Power</i>	
<b>Project Participant(s):</b> 1. SC Ovidiu Development S.R.L. 20 Nicolae Iorga Street 900612 Constanta Romania (the client who ordered determination)  2. CEZ a.s. Duhova 2/1444 Street 14053 Praha 4 Czech Republic URL : <a href="http://www.cez.cz">www.cez.cz</a> Email : <a href="mailto:cez@cez.cz">cez@cez.cz</a>	<b>Project Site(s):</b> <i>Cogealac Village, Constanta county in Romania</i> <b>GPS Coordinates (Cogealac):</b> Latitude: 28.5248 ° (N 28° 31' 29") Longitude: 44.5495 ° (E 44° 32' 58")
<b>Project Title:</b> <i>Cogealac Wind Power Project</i>	
<b>Applied Methodology / Version:</b> ACM 0002/ Version 10	<b>Scope(s):</b> 1 <b>Technical Area(s):</b> 1.1
<b>First PDD Version (GSP):</b> Date of issuance: 09-03-2010 Version No.: 02 Starting Date of GSP 24-03-2010	<b>Final PDD version:</b> Date of issuance: 11-01-2011 Version No.: 08
<b>Estimated Annual Emission Reduction:</b> <b>612 278 tCO<sub>2</sub>e</b>	
<b>Assessment Team Leader:</b> Robert Mitterwallner  <b>Assessment Team Members:</b> Dr. Nuri Mol  <b>Expert:</b> Constantin Zaharia  <b>Trainees:</b> Laura Pop Vaida Nevena Pingarova	<b>Technical Reviewer:</b> Thomas Kleiser  <b>Responsible Certification Body Members:</b> Thomas Kleiser



**Summary of the Determination Opinion:**

- The review of the project design documentation and the subsequent follow-up interviews have provided TÜV SÜD with sufficient evidence for the determination of the project's fulfilment of all stated criteria. In our opinion, the project meets all national guidelines and procedures of the host country *Romania* for JI track 1 ([www.mmediu.ro](http://www.mmediu.ro)) as well as the specific requirements of the LoE of the DFP of *Romania*. Therefore, TÜV SÜD recommends the project for registration by the DFP of Romania if the letters of approval of all Parties involved will be available.
- The review of the project design documentation and the subsequent follow-up interviews have not provided TÜV SÜD with sufficient evidence for the determination of the project's fulfilment of all stated criteria. Therefore, TÜV SÜD will not recommend the project for registration by the DFP of Romania and will inform the project participants and the DFP of Romania of this decision.

## Abbreviations

<b>AIE</b>	Accredited Independent Entity
<b>AMS</b>	Automated Measurement System
<b>CAR</b>	Corrective Action Request
<b>CDM</b>	Clean Development Mechanism
<b>CER</b>	Certified Emission Reduction
<b>CR</b>	Clarification Request
<b>DFP</b>	Designated Focal Point
<b>DVM</b>	Determination and Verification Manual
<b>EF</b>	Emission Factor
<b>EIA / EA</b>	Environmental Impact Assessment / Environmental Assessment
<b>ER</b>	Emission Reduction
<b>ERU</b>	Emission Reduction Unit
<b>FAR</b>	Forward Action Request
<b>GHG</b>	Green House Gas(es)
<b>GSP</b>	Global Stakeholder Process
<b>IPCC</b>	Intergovernmental Panel on Climate Change
<b>IRL</b>	Information Reference List
<b>IRR</b>	Internal Rate of Return
<b>JI</b>	Joint Implementation
<b>JISC</b>	JI Supervisory Committee
<b>KP</b>	Kyoto Protocol
<b>LoA</b>	Letter of Approval
<b>LoE</b>	Letter of Endorsement
<b>MP</b>	Monitoring Plan
<b>NGO</b>	Non Governmental Organisation
<b>PDD</b>	Project Design Document
<b>PP</b>	Project Participant
<b>TÜV SÜD</b>	TÜV SÜD Industrie Service GmbH
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change



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## 1 INTRODUCTION

### 1.1 Objective

Determination is an independent assessment by a Third Party (Accredited Independent Entity = AIE) of a proposed project activity against the defined set of criteria for registration under the Joint Implementation (JI). Determination is also part of the JI Track 1 project cycle and will finally result in a conclusion by the executing AIE whether a project activity is valid, and should therefore be submitted for registration to the Designated Focal Point (DFP) for JI project implementation in *Romania–Ministry of Environment and Forestry*. The ultimate decision on the registration of a proposed project activity rests with the DFP in Romania and the Parties involved.

The project activity mentioned in this Determination Report has been submitted under the project title: “**Cogealac Wind Power Project**”.

The company – *Ovidiu Development SRL* - has contracted TÜV SÜD Industrie Service GmbH to conduct a determination of the above mentioned JI project in Cogealac Village, Constanta County, Romania. The project was designed as a Track 1 project, thus according to the “National guidelines and procedures for approving JI projects” the project has been published on the DFP website, [http://www.mmediu.ro/protectia\\_mediului/schimbari\\_climatice.htm](http://www.mmediu.ro/protectia_mediului/schimbari_climatice.htm) and in the context of the Global Stakeholder Process (GSP) the project was published on the [www.netinform.de](http://www.netinform.de) website for a period of 30 days up from 24<sup>th</sup> March 2010 at the following web link:

[www.netinform.de/KE/Wegweiser/Guide22.aspx?ID=6959&Ebene1\\_ID=50&Ebene2\\_ID=2316&mode=5](http://www.netinform.de/KE/Wegweiser/Guide22.aspx?ID=6959&Ebene1_ID=50&Ebene2_ID=2316&mode=5)

Under JI Track 1, requirements for the final approval are set by the DFP involved, mainly the DFP of the host country and in this case it is the Romanian DFP. The general requirements, “National guidelines and procedures for approving JI projects” and the project specific DFP requirements for this project are described in the LoE of the Romanian DFP (IRL-No. 1).

The determination serves as a conformity test of the project design and is a requirement for all JI projects. In particular the project’s baseline, the monitoring plan (MP), and the project’s compliance with host country criteria and general relevant UNFCCC criteria are validated in order to confirm that the project design, as documented, is sound and reasonable and meets the stated requirements and identified criteria. Determination is considered necessary to provide assurance to stakeholders of the quality of the project and its intended generation of emission reductions known as Emission Reduction Units (ERU - in the first commitment period under the Kyoto Protocol).

UNFCCC JI criteria refer to the Kyoto Protocol Article 6 criteria and the Guidelines for the implementation of Article 6 of the Kyoto Protocol as agreed in the Marrakech Accords.

### 1.2 Scope

The scope of any assessment is defined by the underlying legislation, regulation and guidance given by relevant entities or authorities. In the case of JI project activities, the scope is set by:

- The Kyoto Protocol, in particular § 6
- Further COP/MOP decisions with reference to the JI, in particular the annex to decision 9/CMP.1 (referred to as JI Guidelines)
- Decisions of the JISC published under <http://ji.unfccc.int> (for general guidance)

- Decisions and specific guidance by the JISC published under <http://ji.unfccc.int> (for general guidance)
- Guidelines for Completing the Project Design Document (JI-PDD)
- Joint Implementation Determination and Verification Manual (DVM)
- The applied approved methodology
- The technical environment of the project (technical scope)
- Internal and national standards on monitoring and QA/QC
- Technical guideline and information on best practice
- Additional national requirements as set by the DFP of the host country

The determination process is not meant to provide any form of consulting for the project participant (PP). However, stated requests for clarifications, corrective actions, and/or forward actions may provide input for improvement of the project design.

The first version of the PDD, version 02, dated 09.03.2010, received by TÜV SÜD was made publicly available on the internet at TÜV SÜD's webpage as mentioned above. The applied methodology was ACM 0002, "Consolidated baseline methodology for grid-connected electricity generation from renewable sources", Version 10, which was valid at that time (IRL-No. 3).

The only purpose of a determination is its use during the registration process as part of the JI Track 1 project cycle. Hence, TÜV SÜD cannot be held liable by any party for decisions made or not made based on the Determination opinion, which will go beyond this purpose.

The determination scope is defined as an independent and objective review of the PDD and other relevant supporting documents. The information in these documents is reviewed against Kyoto Protocol requirements, UNFCCC rules and associated interpretations. The rules for Track 1 have to be finalised by the DFP of the host country.

TÜV SÜD followed the recommendations in the DVM (JISC 19; IRL 63) for the determination. In this particular case a project specific determination protocol had been developed and used.

According to the Corrective Action Requests (CARs) and Clarification Requests (CRs) addressed during the audit process the client decided to revise and update the PDD to version 8 from 11.01.2011 (IRL 64). This final version of the PDD serves as the basis for the final conclusions presented herewith.

In order to evaluate the PDD and corresponding documentation, it was obvious that the competence and capability of the determination team had to cover at least the following aspects:

- Knowledge of Kyoto Protocol and the Marrakech Accords
- Environmental and Social Impact Assessment
- Skills in environmental auditing (ISO 14001)
- Quality Assurance
- Knowledge of energy generation from wind power and other renewable sources
- Baseline concepts
- Monitoring concepts

- Political, economical and technical random conditions in host country

## 2 METHODOLOGY

The project assessment aims at being a risk based approach and is based on the methodology developed in the DVM, an initiative of Designated and Applicant Entities, which aims to harmonize the approach and quality of all such assessments.

In order to ensure transparency, a determination protocol was customised for the project. TÜV SÜD developed a checklist and protocol based on the templates presented by the DVM. The protocol shows, in a transparent manner, criteria (requirements), the discussion of each criterion by the assessment team and the results from validating the identified criteria. The Determination Protocol serves the following purposes:

- It organises, details and clarifies the requirements a JI project is expected to meet;
- It ensures a transparent Determination process where the validator will document how a particular requirement has been validated and the result of the Determination.

The Determination protocol for this project consists of three tables. The different columns in these tables are described in the figure below.

The completed Determination protocol is enclosed in Annex 1 to this report.

<b>Determination Protocol Table 1: Conformity of Project Activity and PDD</b>				
<b>Checklist Topic / Question</b>	<b>Reference</b>	<b>Comments</b>	<b>PDD in GSP</b>	<b>Final PDD</b>
<i>The checklist is organised in sections following the arrangement of the applied PDD version. Each section is then further sub-divided. The lowest level constitutes a checklist question / criterion.</i>	<i>Gives reference to documents where the answer to the checklist question or item is found in case the comment refers to documents other than the PDD.</i>	<i>The section is used to elaborate and discuss the checklist question and/or the conformance to the question. It is further used to explain the conclusions reached. In some cases sub-checklist are applied indicating yes/no decisions on the compliance with the stated criterion. Any <b>Request</b> has to be substantiated within this column</i>	<i>Conclusions are presented based on the assessment of the first PDD version. This is either acceptable based on evidence provided (<input checked="" type="checkbox"/>) , or a <b>Corrective Action Request (CAR)</b> due to non-compliance with the checklist question (See below). <b>Clarification Request (CR)</b> is used when the Determination team has identified a need for further clarification.</i>	<i>Conclusions are presented in the same manner based on the assessment of the final PDD version.</i>



Table 2 presents the summary of project proponent’s response to the CARs and CRs as well as the Determination team’s conclusions. This table may also include any Open Issues addressed during the Determination process.

<b>Determination Protocol Table 2: Resolution of Corrective Action and Clarification Requests</b>			
<b>Clarifications and corrective action requests</b>	<b>Ref. to table 1</b>	<b>Summary of project owner response</b>	<b>Determination team conclusion</b>
<i>If the conclusions from Table 1 are either a Corrective Action Request or a Clarification Request, these should be listed in this section.</i>	<i>Reference to the checklist question number in Table 1 where the Corrective Action Request or Clarification Request is explained.</i>	<i>The responses given by the client or other project participants during the communications with the Determination team should be summarised in this section.</i>	<i>This section should summarise the Determination team’s responses and final conclusions. The conclusions should also be included in Table 1, under “Final PDD”.</i>

In case of any unsatisfactory response from the project proponent to any of the CARs, CRs or Open Issues, the unresolved issues will be presented in table 3.

<b>Determination Protocol Table 3: Unresolved Corrective Action and Clarification Requests</b>		
<b>Clarifications and corrective action requests</b>	<b>Id. of CAR/CR 1</b>	<b>Explanation of the Conclusion for Denial</b>
<i>If the final conclusions from Table 2 results in a denial the referenced request should be listed in this section.</i>	<i>Identifier of the Request.</i>	<i>This section should present a detailed explanation, why the project is finally considered not to be in compliance with a criterion.</i>

## 2.1 Appointment of the Assessment Team

According to the technical scopes and experiences in the sectoral or national business environment, TÜV SÜD has composed a project team in accordance with the appointment rules of the TÜV SÜD certification body “climate and energy”. The composition of an assessment team has to be approved by the Certification Body (CB) to assure that the required skills are covered by the team. The CB TÜV SÜD operates four qualification levels for team members that are assigned by formal appointment rules:

- Assessment Team Leader (ATL)
- Determiner (D)
- Trainee (T)
- Experts (E)

It is required that the sectoral scope/s and the technical area/s linked to the methodology and project have to be covered by the assessment team. The Determination team consisted of the following members (Assessment Team Leader is written in bold letters):

Name	Qualification	Coverage of scope	Coverage of technical area	Host country experience
<b>Robert Mitterwallner</b>	<b>ATL</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Dr. Nuri Mol	Determiner	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Constantin Zaharia	E	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nevena Pingarova	T	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Laura Pop-Vaida	T	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Robert Mitterwallner** is located at TÜV SÜD Industrie Service in Munich since 1990 and has a background as auditor for environmental management systems, as expert in environmental permit procedures for industrial plants and as expert for environmental impact studies assessment. He has received intensive training in the JI determination/verification and CDM validation/verification process and applied successfully as GHG Determiner, GHG Validator, GHG Verifier as well as Assessment Team Leader for climate change projects, among others, in the scope energy industries, e.g. wind farms. Moreover, he has been appointed as Auditor for Renewable Energy Certification.

**Dr. Nuri Mol** has been working for 25 years as expert and consultant in environmental sector. He was consultant to various industries, e.g. iron & steel, food, water supply, hazardous waste management. He received intensive training at Carbon Management Service with TÜV SÜD and participated as GHG auditor in more than 40 validation and verification processes with various scopes. Dr. Mol is appointed as determiner and verifier for JI and for voluntary projects within TÜV SÜD Industrie Service GmbH.

**Constantin Zaharia** is environmental engineer and is working as GHG Verifier in the Carbon Management Service Department of TÜD SÜD Industry Service GmbH, Germany. He has several years of experience in JI projects. He covered together with other team members the country expertise and the knowledge of Romanian language as well as all respective national (environmental) laws.

**Nevena Pingarova** is appointed as Financial Expert and an auditor trainee for greenhouse gas emissions at Carbon Management Service Department in TÜV SÜD Industrie Service GmbH. She has a Masters degree in Forecasting and Planning of Economic Systems from the University of World and National Economy, Sofia. Prior to joining TÜV SÜD Nevena Pingarova has 5 years experience as a JI project developer in scope 1.

**Laura Pop-Vaida** is mechanical engineer with B.Sc. in Engineering and Management of Production Systems. She has work experience in the field of mechanical engineering and quality assurance. She has a Master degree in quality assurance. At the time of the onsite visit Laura Pop-Vaida was a GHG trainee and covered - together with other team members - the country expertise and the knowledge of Romanian language as well as all respective national (environmental) laws.

## 2.2 Review of Documents

The first version of the PDD was submitted to the AIE in March 2010. The first PDD version submitted by the PP and additional background documents related to the project design and baseline have been reviewed to verify the correctness, credibility, and interpretation of the presented information.

Furthermore, a cross-check between information provided and information from other sources (if available) has been done as an initial step of the determination process. A complete list of all documents and evidence material reviewed is attached as Annex 2 to this report.

## 2.3 Follow-up Interviews

Physical site inspections and interviews with the project developer and the PP were held between 07<sup>th</sup> April 2010 and 09<sup>th</sup> April 2010 to confirm relevant information, and to resolve issues identified in the first document review. The table below provides a list of all persons interviewed in this process.

Name	Organisation, Position
<i>Ondrei Safar</i>	CEZ Romania CEZ Representative Romania
Adrian Tita	CEZ Czech Republic, Project Manager M&A
Cristian Hornea	CEZ Romania, Site Supervisor Civil Works
Francesco Tubiello	GET Carbon, Project Developer
Liviu Gheorghe	GET Carbon, Project Developer
Valentina Stupar	CEZ Romania, JI Project Manager
Eva Polanska	CEZ Czech Republic, Climate Change JI/CDM
Florentina Manea	Ministry of Environment Romania, Head of DFP
Miriana Roman	Ministry of Environment Romania, DFP

## 2.4 Further cross-check

During the determination process the team has made reference to available information related to similar projects or technologies as the JI project activity. Project documentation has also been reviewed against the project specific methodology to confirm the appropriateness of formulae and correctness of calculations.

## 2.5 Resolution of Clarification and Corrective Action Requests

The objective of this phase of the determination is to resolve the requests for corrective actions, clarifications, and any other outstanding issues which needed to be clarified for TÜV SÜD's conclusion on the project design. The CARs and CRs raised by TÜV SÜD were resolved during communication between the project developer / PP and TÜV SÜD. To guarantee the transparency of the determination process, the concerns raised and responses that have been given are documented in more detail in the determination protocol in Annex 1.

The final PDD, version 8 from 11 January 2011 serves as the basis for the final assessment presented.

## 2.6 Internal Quality Control

Internal quality control is the final step of the determination process and involves the internal quality control by the CB "climate and energy" of the final documentation, which includes the determination report and annexes. The completion of the quality control indicates that each report submitted has been approved either by the head of the CB or the deputy (a veto person can be used if necessary).

In projects where either the Head of the CB or his/her deputy is part of the assessment team, the approval is given by the one not serving on the project.

It is the ultimate decision of TÜV SÜD's Certification Body whether a project will be submitted for requesting registration at the Romanian DFP or not.

### **3 SUMMARY**

The assessment work and the main results are described below in accordance with the DVM reporting requirements. The reference documents indicated in this section and Annex 1 are stated in Annex 2.

#### **3.1 Approval**

The project participants are SC Ovidiu Development SRL, Romania and CEZ a.s., Czech Republic. Neither of the involved Parties, i.e. Romania and The Netherlands wishes to be considered as Project Participant. The host Party Romania meets the requirements to participate in the JI (see chapter 1.1).

The Romanian DFP, has issued the LoE (IRL No.1) on 26.06.2009 indicating that the DFP does not have any fundamental objections to this particular project.

#### **3.2 Project design document**

The PDD is compliant with the form published by the Romania DFP (IRL-No. 2, see Annex 1).

The PDD is compliant with relevant form and guidance as provided by the UNFCCC JISC. TÜV SÜD concludes that the guidelines for the completion of the PDD in their most recent version have been followed. Relevant information has been provided by the participants in the applying PDD sections. Completeness was assessed through the checklist included to Annex 1 of this report.

#### **3.3 Project description**

The following description of the project as per PDD was verified during the on-site audit:

The project consists of the installation and operation of 101 wind turbine-generator units (each with 2.5 MW rated capacity, GE 2.5xl) for electricity production, based on favourable wind conditions available in the area. The total design capacity is 252.5 MW and full operation expected in April 2011. This will be also the moment of grid connection. The project site is located on the western side of Cogealac Village, Constanta County. The proposed wind farm is about 40 km north of Constanta and 15 km from the Black Sea coastline. The expected net annual generation of the project activity is approximately 735,037 GWh. By replacing fossil fuel based power generation of the national Romanian electricity grid, estimated 612,278 tCO<sub>2</sub> will be reduced annually. The project is being developed by CEZ, Czech Republic and SC OVIDIU DEVELOPMENT SRL, Romania.

The information presented in the PDD on the technical design is consistent with the actual planning and implementation of the project activity as confirmed by:

- The review and cross check of data and information (see Annex 2).

- An on-site visit which has been performed. Relevant stakeholder and personnel with knowledge of the project were interviewed. In case of doubt, further cross checks through additional interviews via phone were conducted.
- Information related to similar projects or technologies which have been used to validate the accuracy and completeness of the project description.

In conclusion, TÜV SÜD confirms that the project description, as included in the PDD, is sufficiently accurate and complete in order to comply with the general and specific JI requirements.

### **3.4 Baseline scenario and monitoring methodology**

#### **3.4.1 Applicability of the selected methodology**

A project specific methodology based on the CDM methodology ACM0002 “Consolidated baseline methodology for grid-connected electricity generation from renewable sources” Version 10 (IRL 3) is applied. The used version 10 of the methodology was valid (till 25 October 2010) , when the determination was requested by PP. The project is in compliance with applicability condition as listed in the chosen baseline and monitoring methodology.

The assessment was carried out for each applicability criteria and included, among other checks, the compliance check of the local project setting with the applicability conditions in regard to baseline scenario setting and eligible project measures. This assessment also included the review of secondary sources, which further demonstrate that applicability conditions have been complied with.

The specific protocol that has been derived from the ACM 0002, included in the annex 1, documents the assessment process. The protocol also includes the steps taken in the assessment process. The results of the compliance check as well as relevant evidence are detailed in annex 1.

TÜV SÜD confirms that the chosen baseline and monitoring methodology is applicable to the project activity. In fact there are three deviations from the ACM002, all accepted under the JI track 1 procedure:

- Use of ACM0002 version 10 (valid at the time of starting the project activity and the determination started ) Calculation of emission reduction with an emission factor taken from another JI registered project in Romania (Timisoara Centru) – 0.833 g<sub>CO2</sub>/kWh, which is lower than the EF published by the grid operator (“ANRE Annual report Statistical data on electricity”) of 0.921 g<sub>CO2</sub>/kWh.
- Simplified use of the “Tool to calculate EF for an electricity system” by assuming EF = OM (BM considered negligible)

All these deviations are discussed in PDD as well as in Annex 1 and have been thoroughly assessed by TÜV SÜD.

Emission sources, which are not addressed by the applied methodology, and which are expected to contribute more than 1% of the overall expected average annual emission reductions, have not been identified.

#### **3.4.2 Project boundary**

The project boundary was assessed in the context of physical site inspection, interviews and based on the secondary evidence received on the design of the project (IRL 40).

The project boundary is the National Power Grid (NPG), since the Romanian Grid is of national scale. Relevant documentation assessed to confirm the project boundary are listed below:

- Contract for connecting to the to transport electricity network (IRL 6)
- Technical approval of connection (IRL 7)

Therefore, TÜV SÜD confirms that the identified boundary, the selected sources and gases as documented in the PDD are justified for the project activity and are fully in line with the requirements set by the applied methodology.

### **3.4.3 Baseline scenario identification**

Applicable CDM methodology ACM0002 “Consolidated baseline methodology for grid-connected electricity generation from renewable sources” refers to the procedure for identification of the baseline. This procedure is applied in the PDD and provides for a step-wise approach to identify the baseline scenario.

The list of plausible alternative scenarios to the project activity is complete and no reasonable alternative scenarios have been excluded.

The baseline scenario is the following: electricity delivered to the grid by the project activity would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources, as reflected in the combined margin (CM) calculations.

Transparent and documented evidences were provided to assessment team during on-site visit. Based on conservative interpretation of collected audit evidences, TÜV SÜD considers that the identified baseline scenario is reasonable.

TÜV SÜD confirms that all relevant JI requirements, including relevant national and / or sectoral policies and circumstances, have been identified correctly taken into account in the definition of the baseline scenario.

A verifiable description of the baseline scenario has been included to the PDD.

In conclusion TÜV SÜD confirms that:

1. All the assumptions and data used by the project participants are listed in the PDD, including their references and sources;
2. All documentation used is relevant for establishing the baseline scenario and correctly quoted and interpreted in the PDD;
3. Assumptions and data used in the identification of the baseline scenario are justified appropriately, supported by evidence and can be deemed reasonable;
4. Relevant national and/or sectoral policies and circumstances are considered and listed in the PDD;

The approved baseline methodology has been correctly applied to identify the most reasonable baseline scenario. The identified baseline scenario reasonably represents what would occur in the absence of the proposed JI project activity.

### **3.4.4 Algorithm and/or formulae used to determine emission reductions**

TÜV SÜD has assessed the calculations of project emissions, baseline scenario emissions, leakage, and emission reductions. During the site visit and the discussions on the tool calculation procedure it is concluded that no excel workbook was necessary, as Cogealac adopts an ex-post approach, using the ex-ante EF factor only to estimate ERs.

The parameters and equations presented in the PDD, as well as other applicable documents, have been compared with the information and requirements presented in the methodology and respective tools.

The assumptions and data used to determine the emission reductions are listed in the PDD and all the sources have been checked and confirmed.

Based on the information reviewed it can be confirmed that the sources used are correctly quoted and interpreted in the PDD.

The values presented in the PDD are considered reasonable based on the documentation and references reviewed and the results of the interviews.

The baseline methodology has been correctly applied according to requirements.

The estimate of the baseline emissions can be confirmed as the same baseline emissions results have been replicated by the audit team using the information provided.

Detailed information on the verification of the parameters used in the equations can be found in annex 1. The algorithms for the determination of the baseline, project, and leakage are discussed in the following sections.

#### **3.4.4.1 Baseline emissions**

Conforming to the applicable CDM methodology ACM0002 Version 10, the baseline emissions to be included in the boundary of the proposed project are CO<sub>2</sub> emissions from electricity generation in fossil fuel fired power plants that are displaced due to the project activity.

Furthermore, the project will use an ex-post approach to determine EF for the purpose of computing project emission reductions. This is possible in a transparent manner because, as part of its EU requirements, Romania is mandated to publish such data for the purpose of its participation to the EU ETS: "CITL Internet site of the European Commission: [http://ec.europa.eu/environment/climat/emission/citl\\_en.htm](http://ec.europa.eu/environment/climat/emission/citl_en.htm)".

According to DFP, successful determination of a JI project by an accredited AIE implies the recognition and implementation of procedures used in that project, including the procedures developed for the calculation of the ex-ante EF at national level. The institutions involved in the endorsement of the EF determined in Timisoara Centru, and applied by Cogealac in its PDD, are Romanian Energy Regulatory Authority, ANPM (National Environmental Agency), and the Ministry of Environment.

The information presented in the PDD has been validated by comparing the grid emission factor: CO<sub>2</sub> grid emission factor ( $EF_{grid,CM,y} = 0.9215 \text{ tCO}_2/\text{MWh}$ ) provided by the Romanian Energy Regulatory Authority - ANRE through the Romanian Designated Focal Point for Joint Implementation to the project used one of  $0.833 \text{ tCO}_2/\text{MWh}$ ) from approved project Timisoara Centru (LoA No. 6119/23.11.2006).

EF used for this project is more conservative than the referenced one and, as mentioned above, used only for the purpose of computing project emission reductions, therefore it is acceptable.

#### **3.4.5 Project emissions**

No emissions are associated with the wind turbines operation.

#### **3.4.6 Leakage**

As per ACM0002 vs. 10, zero leakage is assumed due to the project activity.

### 3.4.7 Emission Reductions

During the site visit the discussions on the calculation procedure issue concluded that no excel workbook was necessary, as Cogealac adopts an ex-post approach, using the ex-ante EF factor only to estimate ERs, taking into account the following parameters presented in the methodology ACM 0002 vs. 10:

$ER_y = BE_y$ , where:

$ER_y$  Emission reductions in year y (t CO<sub>2</sub>e/yr)

$BE_y$  Baseline emissions in year y (t CO<sub>2</sub>e/yr)

In summary, the calculation of the baseline emissions and the emission reductions, respectively, can be considered correct. The baseline emissions are calculated in the PDD in transparent manner and using conservative assumptions.

Therefore The PDD also shows emission reductions for the years beyond 2012. An extended crediting period beyond the first commitment period is subject to the host country's approval.

Based on the calculations in the project documentation it is expected that the project activity will lead to a reduction of GHG emissions of 1 071 486 t / CO<sub>2</sub>e for the crediting period (1<sup>st</sup> April 2011 – 31 December 2012).

### 3.5 Additionality

The additionality of the project has been presented in the PDD using the following "Tool for the demonstration and assessment of additionality" (Version 05.2) - the barrier and common practice analysis.

The approach used in the PDD has been assessed initially through the document review, during which the following documents were reviewed:

- Governmental Decision (GD) 443/2003 for promoting electricity generation from renewable energy (HG 443 /2003), on <http://www.anre.ro/documente.php?id=393> (IRL 59)
- The Renewable Energy Progress Report, on <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/09/639&type=HTML>

On site, the additionality was discussed principally with: Ondrei SAFAR – CEZ Representative in Romania. Further documents have been reviewed on-site (annex 2).

Finally, the data, rationales, assumptions, justifications, and documentation provided have been verified using local knowledge as well as sectoral and financial expertise. This information was also confirmed through the following documentation:

- Status of Wind Power Plant (WP) Connection Contracts, on [www.transelectrica.ro](http://www.transelectrica.ro)
- Reports on inflation, May 2010, on <http://www.bnro.ro/PublicationDocuments.aspx?icid=3922>
- The present operators on WP (Wind Power) market, on [www.anre.ro](http://www.anre.ro)



Based on these determination steps we can confirm that the documentation assessed is appropriate for this project.

### 3.5.1 Starting date, crediting period and prior consideration of carbon finance

#### Timeline of Project Activity

DATE	EVENT	Evidence
24.07.2006	Incorporation of Ovidiu Development (OD)	Company Records
25.07.2007	Date of first license issuance for Wind Partners	Copy
10.12.2007	Continental Wind Partners Majority Shareholder	Company Records
Mar-08	Continental Wind Partners considers JI income for Cogealac	Statement by majority owners
28.05.2008	CEZ receives due diligence	Engineering Report
May-Jun 2008	CEZ Evaluates tender and considers JI as option	Signed statement and emails
29.08.2008	CEZ sole owner of OD	Company records
15.11.2008	OD presentation note on JI for Cogealac	Presentation Note
21.11 2008	Official decision to pursue JI and submit PIN to DFP	Minutes of the Board OD
16.12 2008	First PIN ready	PIN submission letter
02.03.2009	PIN submission to DFP	PIN submission letter
26.06.2009	LoE	Letter from Ministry
20.07.2009	GET-Carbon hired as PDD developer	Copy of contract first page
22.07.2009	OD applies for building permit	Government application
04.09. 2009	Draft PDD submitted to OD and begin search for AIE	Email from project developer
04.09.2009	Wind-Turbine-Generator Supply Contract	Copy
29.10.2009	Date of license revision for 252.5 MW	Copy
09.11.2009	Final PDD submitted to OD	Email from project developer
03.2010	AIE hired	Contract
08.04.2010	AIE Site Visit	Emails
24.05.2010	Date of ODA declaration	Copy of ODA declaration
01.04.2011	Planned start of Operations (Starting date of the crediting period)	ERPA_LOI
31.12.2012	End date of the crediting period	PDD

This confirms that the project complies with the requirements to demonstrate the prior consideration of the JI.

### 3.5.2 Identifications of alternatives

There are two alternatives to the project activity which are consistent with mandatory laws and regulations:

- Alternative 1: No construction of the proposed project; Romanian National Power Grid providing the same annual power generation, and
- Alternative 2: The proposed project not undertaken as a JI project activity.

### 3.5.3 Investment analysis

No investment analysis has been applied.

### 3.5.4 Barrier analysis

It is clearly shown that:

- there is no private capital available from domestic or international capital markets due to risks associated with investment in Romania associated with the global economic crisis. Which is the investment barrier preventing implementation of project activity without JI revenues;
- there is also the barrier due to prevailing practice as – at present - there are no similar size wind park activities operational in Romania;

The two barriers explained above do not prevent Alternative 1 “No construction of the proposed project; Romanian National Power Grid providing the same annual power generation” but prevent alternative 2 “The proposed project not undertaken as a JI project activity”.

The Investment barrier has been assessed against official documents such as: National Bank of Romania - Inflation Report (<http://www.bnro.ro/PublicationDocuments.aspx?icid=3922>, Reports on inflation, May 2010). The result of this assessment clearly shows that the barriers presented in the PDD can be considered real.

This barrier would prevent the project activity but would not prevent the baseline of the project. This is confirmed through the documentation review and interviews.

The technological barrier has been assessed considering the fact that there is no experience in operation of such size wind power park. The result of this assessment clearly shows that the barrier presented in the PDD can be considered real. The risk involved in planning, building and operating such a large size project on the Romanian renewable wind energy market presents a high technological barrier, given:

- Lack of locally available specialized capacity for building the wind park, involving a high risk of making costly errors during the construction and testing of the wind park;
- Lack of locally available specialized capacity for operating and maintaining the equipment, involving a risk of underperformance of the wind park.

The barriers due to prevailing practice have been assessed considering the fact that, at present there is no other similar size wind park that has been implemented and is in operation in Romania. By contrast, prevailing practice in Romania is the operation of very small wind power stations. Hence the fact that existing experience is limited to designing, building and operating small wind power systems does represent a barrier to implementation of the CWPP project activity.

Governmental Decision 443/2004 and Law 220/2008 propose a system for eliminating some of the disadvantages of Renewable Energy Systems (RES) electricity generation compared to electricity generation from conventional sources ( “promoting RES electricity generation” ); the system consists in a mix of Green Certificates and Mandatory quotas. The efficiency of the promotion system is doubtful and though the system exists, the quotas may be modified retroactively by ANRE, for the preceding year; e.g.: the quota for year 2009 was established at 6.28% by Law 220/2008; through Order 97/2009, ANRE modified the quota to 0.589% (or about 10 times lower).

Taking into account the description and the determination of the barriers presented above, the assessment team can confirm, with reasonable certainty, that the barriers are credible and correctly presented to demonstrate the additionality of the project.

### **3.5.5 Common practice analysis**

The region for the common practice analysis has been defined as the territory of Romania. The project activity’s technology can be found in different countries or regions, where different situations can appear. As a result, the region is defined by taking into account similar technologies as well as similar industry types.

The assessment team has reviewed the approach presented in the PDD and can confirm that relevant parameters such as location, infrastructure, economic situation, and development have been taken into account in order to define the region to be used for the common practice.

The assessment team has reviewed official sources such as Romanian Energy Regulatory Authority (ANRE) and Ministry of Environment. This information confirms that the list of similar projects presented in the PDD is complete (IRL 44, 49). Additionally, the team further verified the information based on interviews.

All similar projects, which are not JI projects, have been checked through reviewing all available documentation (See annex 2). Furthermore, the essential distinctions between these projects and the JI project in question have been confirmed using: Status of WP Connection Contracts \_Situatie\_Contracte\_Racordare\_CEE found on the following website: [www.transelectrica.ro](http://www.transelectrica.ro) from Romanian Power Grid Company.

Other wind projects with high capacity (e.g. Casimcea 210 MW and Babadag 48 MW projects) are under construction or not operational at present. As of 2009 there is an installed wind power capacity of 14MW in Romania (IRL 56). Another wind farm of similar size in the proximity - Fantanele WP is under construction without JI registration. Fantanele WP has got special support from Bayerische Landesbank and EIB Banks as presented below, and cannot be considered as a project facing similar risks. Thus Fantanele Wind Power Plant is excluded from the common practice analysis considerations.

The following links provide the special financing terms for Fantanele project.

First link: “[http://www.finmedia.ro/conferences/conferintele/energy\\_forum/ed1/prezentation.php](http://www.finmedia.ro/conferences/conferintele/energy_forum/ed1/prezentation.php)” - 14 Mai, Adrian Borotea presentation - is referring to the present status of Fantanele and Cogealac projects. Second one, “<http://www.cez.ro/index.php?id=2&b=96&l=1>” – is proving that CEZ Group has successfully signed a loan facility amounting to EUR 262.350.000 with cover of German Export Credit Agency Hermes. The Mandated Lead Arrangers and Lenders are Bayerische Landesbank, BNP Paribas Bank N.V., Ceskoslovenská obchodní banka, a. s., and KBC Bank Deutschland AG. BNP Paribas acted as Structuring and Coordinating Bank, Bayerische Landesbank acts as Agent. The purpose of the loan is financing of an export contract with a multinational supplier on German

equipment during the construction of Fantanele Wind Park project with installed capacity of 347.5 MW in Romania. The maturity of the loan will be 15 years". The last link:

"<http://www.eib.org/projects/pipeline/2007/20070524.htm>" is the European Investment Bank approval of 200 mil Euro for the project in Fantanele.

Therefore, it can be confirmed that the proposed JI activity is not a common practice in the defined region.

### **3.6 Monitoring plan**

The monitoring plan presented in the PDD complies with the requirements of the applicable methodology. The assessment team has verified all parameters in the monitoring plan against the requirements of the methodology; no relevant deviations have been found.

The procedures have been reviewed by the assessment team through document review and interviews with the relevant personnel. This information, together with a physical inspection, allows the assessment team to confirm that the proposed monitoring plan is feasible, and within the project design. The major parameters to be monitored have been discussed with the PPs. In specific, these parameters include the location of meters, data management, and the quality assurance and quality control procedures to be implemented in the context of the project.

The bi-directional meters are to be based at the point where invoicing happens; in practice, they are installed on the HV side of the last transformer before the Grid's power line. Metered net electricity generation data will be measured continuously. A monthly report of metered net electricity generation data will be generated by the Supervisor, and saved in electronic and paper form. The monthly report will be generated using a template, approved by the Manager, to ensure that the data is reported consistently and can be compared to previous months. The Manager will review this report and cross check this against the invoices for the quantity of electricity exported and sold. Any irregularities will be signalled and investigated appropriately.

The project has the necessary provisions for emergency preparedness to deal with any unforeseen events. In the event that the main meter, which is used to record the net electricity exported by the project, is found to be faulty it will be repaired or replaced and the data from the back-up meters will be used in its place.

Therefore, we find that the PP's will be able to implement the monitoring plan and the achieved emission reductions can be reported ex-post and verified.

It is described in section D of the PDD. The monitoring tasks and the monitoring responsibilities are clearly defined. Monitoring is simplified by the fact that there are no project specific emissions. To calculate the achieved emission reductions, only the net electricity production of the wind farm has to be measured. The quality of the data as well as their collection and archiving is defined in the monitoring plan.

### **3.7 Sustainable development**

The LoE of the host country presented a statement that the project contributes to the sustainable development of the host party.

### **3.8 Local stakeholder consultation**

The project has passed the approval following a two-step procedure as per Romanian regulations. The first step was the Land use planning and the second step was the Environmental approval. At both stages a public hearing is required, where stakeholders can give comments.

The evidence of these stakeholder reports is found in IRL 4. The assessment team has reviewed the documentation in order to validate the inclusion of relevant stakeholders. The summary of comments presented in the PDD has been verified with the documentation of the stakeholder consultation and is found to be complete.

Additionally to these public hearings the PDD was published on the website of the Romanian Ministry of Environment and Sustainable Development.

Hence, the local stakeholder consultation has been adequately performed according to the JI requirements.

### **3.9 Environmental impacts**

The project participants undertook an environmental impact assessment. The assessment team reviewed the documentation of the presented information. The Environmental Agreement (IRL 5), and the Environmental Impact Assessment Summary (IRL 8) confirm the correctness of the approach used by the PPs. The audit team concludes that the PPs followed the requirements of the host country in regard to environmental regulations.

## 4 COMMENTS BY PARTIES, STAKEHOLDERS AND NGOS

TÜV SÜD published the project documents on the UNFCCC website, and invited comments by affected Parties, stakeholders, and non-governmental organisations during a 30 day period.

The following table presents all gathered key information:

<b>website:</b> <a href="http://www.netinform.de/KE/Wegweiser/Guide22.aspx?ID=6959&amp;Ebene1_ID=50&amp;Ebene2_ID=2316&amp;mode=5">www.netinform.de/KE/Wegweiser/Guide22.aspx?ID=6959&amp;Ebene1_ID=50&amp;Ebene2_ID=2316&amp;mode=5</a>	
<b>Starting date of the global stakeholder consultation process:</b> 2010-03-24	
<b>Comment submitted by:</b> None	<b>Issues raised:</b> -
<b>Response by TÜV SÜD:</b> -	

No comments have been received.

## DETERMINATION OPINION

TÜV SÜD has performed a determination of the following proposed JI project activity:

“Cogealac Wind Power Project” in Romania.

Standard auditing techniques have been used for the determination of the project. Methodology-specific customized checklists and a protocol for the project have been prepared to carry out the audit in order to present the outcome in a transparent and comprehensive manner.

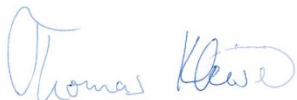
The review of the project design documentation, subsequent follow-up interviews and further verification of references have provided TÜV SÜD with sufficient evidence to determine the fulfilment of stated criteria in the protocol. In our opinion, the project meets all general JI track 1 requirements and the specific requirements of the DFP of the host country if the underlying assumptions do not change. TÜV SÜD will recommend the project for registration by the DFP of the host country.

An analysis, as provided by the applied methodology, demonstrates that the proposed project activity is not a likely baseline. Emission reductions attributable to the project are additional to any that would occur in the absence of the project activity. Given that the project is implemented as designed, the project is likely to achieve the estimated amount of emission reductions as specified within the final PDD version.

Additionally the assessment team reviewed the estimation of the projected emission reductions. We can confirm that the indicated amount of emission reductions of 1 071 486 t / CO<sub>2</sub>e for the crediting period (1<sup>st</sup> April 2011 – 31 December 2012) represent a reasonable estimation using the assumptions given by the project documents.

The determination is based on the information made available to us, as well as the engagement conditions detailed in this report. The determination has been performed following the DVM requirements. The single purpose of this report is its use during the registration process by the DFP of the host country. TÜV SÜD can therefore not be held liable by any party for decisions made, or not made, based on the determination opinion beyond that purpose.

**Munich, 12-01-2011**



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**Thomas Kleiser**

**Certification Body “climate and energy”  
TÜV SÜD Industrie Service GmbH**

**Munich, 12-01-2011**



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**Robert Mitterwallner**

**Assessment Team Leader**

Determination of the JI Track 1 Project:  
*Cogevalac Wind Power Project*



Industrie Service

## **Annex 1: Determination Protocol**



# JI-Determination Protocol

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**TABLE 1 CHECKLIST FOR DETERMINATION OF JI-PROJECTS**

CHECKLIST TOPIC / QUESTION	Ref.	COMMENTS	PDD in GSP	Final PDD
<b>A. General description of the project</b>				
<b>A.1. Title of the project:</b>				
A.1.1. Does the used project title clearly enable to identify the unique JI activity?	50, 51	<p>The project title “Cogealac Wind Power Project” indicates the project activity.</p> <p>The project title enables clearly to identify the project activity.</p> <p>The registry document issued by ANRE (Energy Market Regulatory Authority) has been submitted. This agreement refers to a capacity of 192.5 MW (77x2.5), whereas the overall capacity of the wind park is indicated as 252.5 MW</p> <p><b><u>Clarification Request 1</u></b></p> <p>Further official ANRE documents regarding the remaining 60 MW capacity should be submitted. These documents have to be presented in English as well.</p>	CR1	<input checked="" type="checkbox"/>
A.1.2. Are the sectoral scopes to which the project pertains identified.	60	The wind power project belongs to: Scope (1) : Energy industries (renewable/non-renewable sources)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
A.1.3. Are there any indication concerning the revision number and the date of the revision?	61, 42	<p>The PDD version 02, dated 11 March 2010 has been submitted on 15 March 2010.</p> <p><b><u>Clarification Request 2</u></b></p> <p>Please explain to which entity the PDD version 01 was submitted.</p> <p>The project refers to ACM002, vs.10 for baseline and monitoring. The methodology ACM0002, version11 (EB52) is valid from 26 February 2010 onwards.</p>	CR2 CR3	<input checked="" type="checkbox"/>

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CHECKLIST TOPIC / QUESTION	Ref.	COMMENTS	PDD in GSP	Final PDD
		<p><b><u>Clarification Request 3</u></b></p> <p>Please check the PDD against the most updated relevant methodologies/tools/guidelines regarding baseline and monitoring, grid emission factor, remaining life time, plant load factor and additionality and revise the PDD, if necessary.</p>		
<p>A.1.4. Is this consistent with the time line of the project's history?</p>	<p>60</p>	<p>The project is intended to be completed between April 2010 and April 2011. The startup operation with electricity supply to the Grid is foreseen for 01 April 2011. However, the startup date is differing throughout the PDD.</p> <p><b><u>Clarification Request 4</u></b></p> <p>Please indicate a unique start-up date for the project activity in the PDD and the relevant documents.</p> <p><b><u>Corrective Action Request 1.</u></b></p> <p>Please insert a table in the PDD, section A.2, indicating important milestones of the project activity. Evidence on the relevant dates has to be submitted.</p>	<p><b>CR4 CAR1</b></p>	<p><input checked="" type="checkbox"/></p>
<p><b>A.2. Description of the project:</b></p>				
<p>A.2.1. Is the description delivering a transparent overview of the project activities?</p>		<p>The project activity with its main components and implementation steps is outlined. But see remarks throughout the protocol.</p>	<p><input checked="" type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>A.2.2. What proofs are available demonstrating that the project description is in com-</p>		<p>The PP has submitted the PDD, Excel workbook, other relevant documents for review. Further Information Refer-</p>		<p><input checked="" type="checkbox"/></p>

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CHECKLIST TOPIC / QUESTION	Ref.	COMMENTS	PDD in GSP	Final PDD
<p>pliance with the actual situation or planning?</p>	<p>13, 34, 45, 22-29, 48, 6,7, 4,5,8, 10,11, 12,14, 15,16</p>	<p>ence documents necessary for a detailed cross check are missing.</p> <p><b><u>Clarification Request 5</u></b></p> <p>Please submit further documents for cross check / review :</p> <ul style="list-style-type: none"> <li>- Micrositing Report (as presented during the onsite audit)</li> <li>- Civil Works Permission / License</li> <li>- Contract on High Voltage transmission line works from the Cogealac Wind Power Plant sub-station to 400kV Grid</li> <li>- ODA Declaration</li> <li>- The Govt. Decree on Green Certificates (<a href="http://www.opcom.ro">www.opcom.ro</a>)</li> <li>- Information on Green Investment Scheme (GIS) participation</li> <li>- English summary of Law 220 (2008)</li> <li>- Environmental Impact Assessment Study/Report with English summary</li> <li>- Further EIA related documents - Biodiversity study/report</li> <li>- Evidence on the early consideration of Carbon Credits by the Project Participant in regards with the project implementation</li> <li>- Single Line Diagram (including the position of meters)</li> <li>- Certificates on Training and Qualification of Wind Power Plant Technical Staff (High Voltage, WTG service &amp; maintenance)</li> </ul> <p>Organisation Chart with job description</p>	<p><b>CR5</b></p>	

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CHECKLIST TOPIC / QUESTION	Ref.	COMMENTS	PDD in GSP	Final PDD
		<ul style="list-style-type: none"> <li>- Report on Local Stakeholder meeting (2009) translated in English</li> <li>- Board Decision on considering the JI ERU revenues</li> <li>- Grid Connection and Usage Agreement with Transelectrica, including a summary in English (3 pages as indicated onsite)</li> <li>- Operational Procedures on Plant Operation and Data Management</li> <li>- Information on SCADA system implementation (by WTG supplier)</li> <li>- Contract on the Emergency Gen-Sets product specification</li> </ul>		
A.2.3. Is the information provided by these proofs consistent with the information provided by the PDD?	60	See <b>CRs</b> above	<b>CR5</b>	<input checked="" type="checkbox"/>
A.2.4. Is all information provided consistent with details provided by further chapters of the PDD?	11	<p>The number of WTG units is given as 101 each 2.5 MW rated capacity. This corresponds to 252.5 MW instead the indicated 250 MW in PDD. According to the presented purchase contract with the WTG supplier, 101 units are to be delivered.</p> <p><b><u>Clarification Request 6</u></b></p> <p>Please indicate the plant capacity as given in the supply contract with GE.</p>	<b>CR6</b>	<input checked="" type="checkbox"/>

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CHECKLIST TOPIC / QUESTION	Ref.	COMMENTS	PDD in GSP	Final PDD
<b>A.3. Project participants:</b>				
A.3.1. Is the form required for the indication of project participants correctly applied?	17,13	<p>The form required for the indication of project participants is correctly applied. The issue of project participant is not clearly described. According to the documents (ANRE correspondence), the license holder and project participant is Ovidiu Development SLR.</p> <p>In the PDD however, the project participant is indicated as Ovidiu Development SRL and CEZ (see section A.3 and Annex 1, PDD). The shares of Ovidiu Development SRL, owned by the company Continental, have been purchased by CEZ in 2008. A due diligence on Ovidiu Development SRL and the Cogeaalac Wind Power Project has been done by CEZ before the takeover of the shares.</p> <p><b><u>Clarification Request 7</u></b></p> <p>Please submit the Trade Registry (with English translation of the relevant section) for Ovidiu Development SRL. The shareholder/ownership issue should be indicated clearly. Furthermore the due diligence report regarding the Cogeaalac Wind Power Project should be submitted (with English translation summary).</p>	<b>CR 7</b>	<input checked="" type="checkbox"/>
A.3.2. Is the participation of all listed entities or Parties confirmed by each one of them?	60	<p>The parties involved and the project participants is indicated. See CR7. CEZ branch office in Netherlands is indicated as the purchaser of ERUs. The purchase and transfer of JI ERUs to Netherlands is regulated by the Govt. Accord between Romania and Netherlands.</p> <p><b><u>Clarification Request 8</u></b></p> <p>Please submit a declaration by the involved Parties on</p>	<b>CR 8</b>	<input checked="" type="checkbox"/>

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CHECKLIST TOPIC / QUESTION	Ref.	COMMENTS	PDD in GSP	Final PDD
		their involvement as a "Project Participant". Please submit evidence on the ERU transfer from Romania to Netherlands.		
A.3.3. Is all information provided in consistency with details provided by further chapters of the PDD (in particular annex 1)?	60	Section A.3 and Annex 1 have to be revised accordingly. See <b>CR</b> above	<b>CR 8</b>	<input checked="" type="checkbox"/>
<b>A.4. Technical description of the project:</b>				
<i>A.4.1. Location of the project:</i>				
A.4.1.1. Does the information provided on the location of the project activity allow for a clear identification of the site(s)?	30	Cogealac Wind Power project is located on the eastern part of Romania, in Constanta County. The Cogealac Wind Power Project is located in the region of Dobrogea 40 km to the north from Constanta city, and 15 km from the Black Sea Coast line.  <b><u>Clarification Request 9</u></b> Please submit a table with the geographic coordinates and GPS coordinates of each WTG unit.	<b>CR 9</b>	<input checked="" type="checkbox"/>
A.4.1.2. How is it ensured and/or demonstrated, that the project proponents can implement the project at this site (ownership, licenses, contracts etc.)?	18,19, 20,21, 14,15, 16	Related documents on the project have been submitted: preliminary license by ANRE, purchase contract for the 101 WTG units. But see <b>CR#5, CR#7</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<i>A.4.2. Technology(ies) to be employed, or measures, operations or actions to be implemented by the project:</i>				
A.4.2.1. Does the project design engineering reflect current good practices?	60,31, 32,33	The wind power plant consists of 101 WTG units with 2.5 MW capacity each. According to the supplier GE, approx. 100 units of this type are installed worldwide. See CR#6.	<b>CAR 2</b>	<input checked="" type="checkbox"/>

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CHECKLIST TOPIC / QUESTION	Ref.	COMMENTS	PDD in GSP	Final PDD
		<p><b><u>Corrective Action Request 2.</u></b></p> <p>More technical details about WTG units shall be included into the PDD.</p>		
A.4.2.2. Does the description of the technology to be applied provide sufficient and transparent input to evaluate its impact on the greenhouse gas balance?	60	Yes. It is a wind power plant project. Project emissions caused by the emergency Gen-Set are negligible, the project generates GHG emissions reductions.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
A.4.2.3. Is the technology implemented by the project activity environmentally safe?	5	It is an environmentally safe project. The EIA report/study has to be submitted, see CR5.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
A.4.2.4. Is the information provided in compliance with actual situation or planning?	5,12	The information provided is partly in compliance with actual situation. see remarks above		<input checked="" type="checkbox"/>
A.4.2.5. Does the project use state of the art technology and / or does the technology result in a significantly better performance than any commonly used technologies in the host country?	60,33	It is state-of-art technology. GE has many WTG units operational worldwide. See CR regarding the wind measurement and capacity estimations.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
A.4.2.6. Is the project technology likely to be substituted by other or more efficient technologies within the project period?	33,32	It is not likely that the project technology will be substituted by a more efficient technology. The technology used is state of the art. The operation lifetime of the wind turbines is indicated as 25 years <b><u>Clarification Request 10</u></b> Please submit evidence (supplier feedback) on the operation life time of the wind power plant. Refer to the relevant guide in the UNFCCC methodologies.	<b>CR10</b>	<input checked="" type="checkbox"/>
A.4.2.7. Does the project require extensive initial training and maintenance efforts in	48	The high-tech units (WTG units) and the operation at the HV sub-station onsite require special training.	<b>CR11</b>	<input checked="" type="checkbox"/>

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order to work as presumed during the project period?		<b>Clarification Request 11</b> Please submit the training program on the staff in charge of WTG and HV units.		
A.4.2.8. Is information available on the demand and requirements for training and maintenance?	48	See <b>CR#11</b>		<input checked="" type="checkbox"/>
A.4.2.9. Is a schedule available for the implementation of the project and are there any risks for delays?	60	The presented implementation plan is ambitious, approximately 12 months are estimated for the installation and incommissioning of the 101 WTG units.  See below the discussion regarding the barrier analysis in section B.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>A.4.3. Brief explanation of how the anthropogenic emissions of greenhouse gases by sources are to be reduced by the proposed project, including why the emission reductions would not occur in the absence of the proposed small-scale project, taking into account national and/or sectoral policies and circumstances:</b>				
A.4.3.1. Is the form required for the indication of projected emission reductions correctly applied?	42	The combined margin EF for the Grid emission factor will be utilized ex post and will be adjusted annually :  EF = 0.833.  The combined margin Emission Factor for the public Grid is not determined by the Grid operator (Transelectrica) or the Energy Regulatory Authority (ANRE). According to the project developer GET-Carbon, the EF is taken from the JI project Timisoara Combined Heat and Power Rehabilitation for CET SUD Location.  <b>Clarification Request 12</b>  Please provide detailed evidence on the calculation procedure of EF within the Timisoara CET SUD project (excel	<b>CR12</b>	<input checked="" type="checkbox"/>



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		workbook). Furthermore, the LoA for Timisoara CET SUD is requested.		
A.4.3.2. Are the figures provided consistent with other data presented in the PDD?	60	See <b>CARs</b> and <b>CRs</b> above.		<input checked="" type="checkbox"/>
<b>A.5. Project approval by the Parties involved:</b>				
Open issues related to the approval of the Parties involved are covered in a separate “ <b>completeness checklist</b> ”				
<b>B. Baseline</b>				
<b>B.1. Description and justification of the baseline chosen</b>				
B.1.1. Are reference number, version number, and title of the baseline and monitoring methodology clearly indicated?	60	No. ACM version 11 is valid from 12 February 2010 onwards. See CR#3 <b><u>Clarification Request 13</u></b> Please revise the PDD according to the updated baseline & monitoring methodology ACM 0002, v11.	<b>CR 13</b>	<input checked="" type="checkbox"/>
B.1.2. Is the applied version the most recent one and / or is this version still applicable?	60	No, see remarks above		<input checked="" type="checkbox"/>
B.1.3. Is the applied methodology considered being the most appropriate one?	60	Yes.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B.1.4. Does baseline methodology apply to electricity capacity additions from wind sources?	60	Partly. See further remarks below in section B.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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B.1.5. Can the geographic and system boundaries for the relevant electricity grid clearly be identified and is the information on the characteristics of the grid available	60,56 57	Information on the Grid characteristics (suppliers, sources, capacity) has been discussed. Electricity data sources were referred to ANRE web site.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>B.2. Description of how the anthropogenic emissions of greenhouse gases by sources are reduced below those that would have occurred in the absence of the JI project</b>				
Description of how the baseline scenario is identified and description of the identified baseline scenario				
B.2.1. Have all technically feasible baseline scenario alternatives to the project activity been identified and discussed by the PDD? Why can this list be considered as being complete?	60	Not all feasible alternatives have been discussed. Please refer to v11, ACM0002 according to <b>CR#3</b> .  <b><u>Clarification Request 14</u></b>  Please discuss alternatives according to the Additionality Tool details. Furthermore the Guidelines on Barrier Analysis from EB 50, annex 13 have to be taken into consideration.	<b>CR14</b>	<input checked="" type="checkbox"/>
B.2.2. Have realistic and credible alternatives been identified providing comparable outputs or services? (step 1a)	60	A detailed discussion of alternatives in step 1a is missing. See <b>CR#14</b>		<input checked="" type="checkbox"/>
B.2.3. Is the project activity without JI included in these alternatives? ( <b>step 1a</b> )	60	Yes, but it is not discussed in detail. See Additionality Tool.		<input checked="" type="checkbox"/>
B.2.4. Is a discussion provided for all identified alternatives concerning the compliance with applicable laws and regulations? ( <b>step 1b</b> )	60,58, 57,59	All identified alternatives would be in compliance with the legislation. The energy law ( <b>No. 13/2007</b> ) and the Government Order 39 /2006 regarding Rules for qualification for priority production of electricity from renewable sources were presented to the audit team. The energy supply and demand and trends have been discussed. Actually, there is a surplus of power supply to the Grid. The alternative b)	<b>CR 15</b>	<input checked="" type="checkbox"/>

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		<p>the project implementation without JI ERUs has been abandoned for this reason. See <b>CR 16, CAR 3</b> below.</p> <p><b><u>Clarification Request 15</u></b></p> <p>Please discuss other revenues like Green Certificates, which are based upon the Law 220/2008 and guarantee a feed-in tariff of Euro 27.-/MWh to Euro 55.-/MWh for the renewable energy.</p>		
B.2.5. In case the PDD argues that specific laws are not enforced in the country or region: Is evidence available concerning that statement? (step 1b)		Not relevant	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B.2.6. In case of applying step 2 of the additionality tool: Is the analysis method appropriately identified (step 2a)?		Not applied	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B.2.7. In case of Option I (simple cost analysis): Is demonstrated that the activity produces no economic benefits other than JI income?		Not applied	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B.2.8. In case of Option II (investment comparison analysis): Is the most suitable financial indicator clearly identified (IRR, NPV, cost benefit ratio, or (levelized) unit cost)?		Not applied	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B.2.9. In case of Option III (benchmark analysis): Is the most suitable financial indicator clearly identified?		Not applied	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B.2.10. In case of Option II or Option III: Is the		Not applied	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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calculation of financial figures for this indicator correctly done for all alternatives and the project activity?				
B.2.11. In case of Option II or Option III: Is the analysis presented in a transparent manner providing public available proofs for data?		Not applied	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B.2.12. In case of applying <b>step 3 (barrier analysis)</b> of the additionality tool: Is a complete list of barriers developed that prevent the different alternatives to occur ( <b>step 3a</b> )?	60,50, 51,47	<p>Barrier analysis -step 3 -has been applied to this project. According to the Investment barriers (sub-step 3 a), no similar wind project activities are installed and operational in Romania. During the onsite assessment at the project site in Dobrogea around the village of Cogealac and Fantele on 08.04.2010, it was observed that :</p> <ul style="list-style-type: none"> <li>- A Wind Power Plant with 4 WTG units is installed and operational : According to the first information, the project participant is ROMWIND, the supplier of the WTG units is ENERCON.</li> <li>- A Wind Power Plant with 5 (3xnew, 2xold WTG units) is installed and operational. According to the first information, the project participant is BAIA, the supplier of the WTG units is not known</li> <li>- A Wind Power Plant with 138 GE WTG units and corresponding 345 MW installed capacity, partly installed and close to startup operation. According to the information, the project participant is CEZ.</li> </ul> <p><b><u>Clarification Request 16</u></b></p> <p>Please submit detailed evidence on all wind power plants - planned and/or operational - with public Grid connection.</p>	<p><b>CR 16</b>  <b>CR 17</b>  <b>CAR 3</b></p>	<input checked="" type="checkbox"/>

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		<p><b><u>Corrective Action Request 3.</u></b></p> <p>Please revise the Barrier analysis sub-step 3a accordingly:</p> <p>a. Investment Barriers : Please submit the Due Diligence report before OVIDIU acquisition.</p> <p>b. Technological Barriers : Please discuss the issue linked with other existing wind power plants.</p> <p>c. Barriers due to prevailing practice : The project activity is not first of its kind, please discuss.</p> <p>d. Other barriers : Please discuss, how other project activities have overcome these barriers.</p> <p><b><u>Clarification Request 17</u></b></p> <p>Please explain, how on the one hand conditions for investors were getting attractive since EU membership of Romania in 2007, and in contrary the Ovidiu Development SRL was facing finance barriers.</p>		
B.2.13. In case of applying step 3 (barrier analysis): Is transparent and documented evidence provided on the existence and significance of these barriers?	60	The barrier analysis has been applied according to the Additionality Tool. Some information has been provided regarding the barriers. It is not complete, see <b>CR 16,CAR3</b>		<input checked="" type="checkbox"/>
B.2.14. In case of applying step 3 (barrier analysis): Is it transparently shown that at least one of the alternatives is not prevented by the identified barriers ( <b>step 3b</b> )?	60,53,54,55	No alternatives to the proposed project have been discussed in detail. The outcome of sub-step 3b is "No construction of the Wind Plant and purchase electricity from the grid.	<b>CR 18</b>	<input checked="" type="checkbox"/>

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		<p><b><u>Clarification Request 18</u></b></p> <p>Please explain how other existing wind power plants were implemented without the JI ERUs.</p>		
B.2.15. Have other activities in the host country / region similar to the project activity been identified and are these activities appropriately analyzed by the PDD ( <b>step 4a</b> )?	60	<p>Common Practice Analysis sub-step 4a is missing</p> <p><b><u>Clarification Request 19</u></b></p> <p>Please revise the Common Practice Analysis according to the Additionality Tool and mention other similar existing project activities</p>	CR19	<input checked="" type="checkbox"/>
B.2.16. If similar activities are occurring: Is it demonstrated that in spite these similarities the project activity would not be implemented without the JI ( <b>step 4b</b> )?	60	<p>Common Practice Analysis sub-step 4b is missing. See <b>CR#18</b></p>		<input checked="" type="checkbox"/>
B.2.17. Is it appropriately explained how the approval of the project activity will alleviate the economic and financial hurdles or other identified barriers?	60,56	<p>The barriers have been discussed. On the other hand, it is mentioned (see also section A.4.3), that the Grid has excess capacity.</p> <p><b><u>Clarification Request 20</u></b></p> <p>Please explain the justification for this investment considering the fact that the Grid has excess capacity.</p> <p><b><u>Clarification Request 21</u></b></p> <p>Please refer to "Priority RE 2006" send by mail Ordin ANRE 39/2006</p>	CR 20 CR 21	<input checked="" type="checkbox"/>
<b>B.3. Description of how the definition of the project boundary is applied to the project:</b>				
B.3.1. Do the spatial and technological boundaries as verified on-site comply with the	60	<p>A detailed situation plan has been submitted to the audit team. The project boundary was checked with accompa-</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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discussion provided by the PDD?		nying staff during onsite visit.				
Description of the sources and gases included in the project boundary (Fill in the required amount of sub checklists for sources and gases as given by the methodology applied and comment at least every line answered with "No")						
B.3.2. Source: Emissions from electricity generation in fossil fuel fired power plants of any connected electricity system Gas(es): CO2 Type: baseline emissions		Boundary checklist		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
		Yes / No				
		Source and gas(es) discussed by the PDD?				Yes
		Inclusion / exclusion justified?				Yes
		Explanation / Justification sufficient?				Yes
		Consistency with monitoring plan?		Yes		
<b>B.4. Further baseline information, including the date of baseline setting and the name(s) of the person(s)/entity(ies) setting the baseline</b>						
B.4.1.	Is there any indication of a date when determining the baseline?	60	The baseline was set on 30 September 2009. Global Environmental Technologies GET-Carbon is the project developer.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
B.4.2.	Is this in consistency with the time line of the PDD history?	60	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
B.4.3.	Is information of the person(s) / entity(ies) responsible for the application of the baseline methodology provided in consistency with the actual situation?	60,36	The baseline methodology was completed by : Global Environmental Technologies, GET Carbon. It is based in New York, USA.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
B.4.4.	Is information provided whether this person / entity is also a project participant?	60,36	According to the presented information, GET Carbon is not a Project Participant.		<input checked="" type="checkbox"/>	

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<b>C.</b>					
C.1.	Are the project's starting date and operational lifetime clearly defined and reasonable?	60	Project start day is fixed as 01 April 2011. The operational lifetime is given as 25 years. See previous remarks on the Technical Life Time of the Wind Power Plant.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
C.2.	Is the assumed crediting time clearly defined and reasonable (crediting period between 2008 and 2012)?	60	The crediting time is estimated as 21 months, starting 01 April 2011, ending by 31 December 2012.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
C.3.	Length of the crediting period	60	Dito	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>D. Monitoring plan</b>					
<b>D.1. Description of monitoring plan chosen:</b>					
	Is the applied methodology considered being the most appropriate one?	60	The applied methodology is not the latest one. See <b>CRs</b> above.		<input checked="" type="checkbox"/>
D.1.1.	Option 1 – Monitoring of the emissions in the project scenario and the baseline scenario				
<b>In the following “data checklists” are shown for all data which are fixed at determination time, and “monitoring checklists” for all data which have to be monitored during the life-time of the project.</b>					
D.1.1.1. Data to be collected in order to monitor emissions from the project and how these data will be archived					
	Is the list of parameters presented by chapter D.1.1.1 considered to be complete with regard to the requirements of the applied methodology?		Not relevant	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>



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D.1.1.2. Description of formulae used to estimate project emissions				
Are formulae required for the estimation of project emissions correctly presented enabling a complete identification of parameter to be used and / or monitored		Not relevant	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
D.1.1.3. Data to be collected in order to determine the baseline emissions within the project boundary and how the data is archived				
Parameter Title: $E_{VP}$ Net electricity supplied to the grid	60	The baseline emissions are calculated upon the net electricity supplied to the Grid.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
D.1.1.4. Description of formulae used to estimate baseline emissions				
Is it explained how the procedures provided by the methodology are applied by the proposed project activity?	60	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>D.2. Quality control (QC) and quality assurance (QA) procedures undertaken for data monitored:</b>				
D.2.1.	60,48	<b><u>Clarification Request 22</u></b> Please submit an Operational Procedure (OP) regarding the Data Management.	<b>CR 22</b>	<input checked="" type="checkbox"/>
<b>D.3. Please describe the operational and management structure that the project operator will apply in implementing the monitoring plan:</b>				
D.3.1.	60	<b><u>Clarification Request 23</u></b> Please submit the Organisation Chart of the Plant Management with job description	<b>CR 23</b>	<input checked="" type="checkbox"/>

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D.3.2. Are responsibilities and institutional arrangements for data collection and archiving clearly provided?	60	See <b>CR 21</b> and <b>CR22</b>		<input checked="" type="checkbox"/>
D.3.3. Does the monitoring plan provide current good monitoring practice?	60	Yes, but see the update version of ACM 0002, version 11.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
D.3.4. Is there any monitoring manual for the personnel elaborated which describes detailed procedures and useful information enabling a better understanding and the implementation of the envisioned monitoring provisions?	60	See remarks regarding training.		<input checked="" type="checkbox"/>
<b>D.4. Name of person(s)/entity(ies) establishing the monitoring plan:</b>				
D.4.1. Is information of the person(s) / entity(ies) responsible for the monitoring plan provided in consistency with the actual situation?	60	The baseline methodology was applied by : Global Environmental Technologies, GET Carbon. It is based in New York, USA.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
D.4.2. Is information provided whether this person / entity is also a project participant?	60	According to the presented information, GET Carbon is not a Project Participant.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>E. Estimation of greenhouse gas emission reductions</b>				
<b>E.1. Estimated project emissions and formulae used in the estimation</b>				
<b>E.2. Estimated leakage and formulae used in the estimation, if applicable:</b>				
E.2.1. Are formulae required for the estimation of project emissions correctly presented,		Not relevant	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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enabling a complete identification of parameter to be used and / or monitored?				
E.2.2. Are formulae required for the estimation of leakage emissions correctly presented, enabling a complete identification of parameter to be used and / or monitored?		Not relevant	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>E.3. The sum of E.1. and E.2.:</b>				
E.3.1. Is the data provided under this section in consistency with data as presented by other chapters of the PDD?		Not relevant	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>E.4. Estimated baseline emissions and formulae used in the estimation:</b>				
E.4.1. Are formulae required for the estimation of baseline emissions correctly presented, enabling a complete identification of parameter to be used and / or monitored?	60	The only parameter to be used for emission reduction calculations is the net electricity supplied to the Grid : (GEN-IMP)  Regarding the combined margin Emission Factor : EF=0.833, see previous remarks above.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Explanation of methodological choices				
E.4.2. Is it explained how the procedures provided by the methodology are applied by the proposed project activity?	60	Yes		<input checked="" type="checkbox"/>
E.4.3. Is every selection of options offered by the methodology correctly justified and is this justification in line with the situation verified on-site?	60	Yes		<input checked="" type="checkbox"/>
E.4.4. Are the formulae required for the determination of project emissions correctly	60	Yes.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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presented, enabling a complete identification of parameter to be used and / or monitored?				<input checked="" type="checkbox"/>
Ex-ante calculation of emission reductions				
E.4.5. Is the projection based on the same procedures as used for future monitoring?	60	The EF will be determined ex-post. For the determination process, the ex-ante Grid EF has been chosen. This will be adapted during the verification.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
E.4.6. Are the GHG calculations documented in a complete and transparent manner?	60,46	<b>Clarification Request 24</b> Please indicate the Plant Load factor precisely and submit the micrositing report.	CR 24	<input checked="" type="checkbox"/>
E.4.7. Is the data provided under this section in consistency with data as presented by other chapters of the PDD?	60	Yes.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
E.4.8. Is the choice of options to determine the emissions factor (OM, BM) justified in a suitable and transparent manner?	60,57	It is assumed that the build margin is negligible. Based upon the new findings, this has to be checked again. Not all updated supplying energy sources to the Grid seem to be considered.  <b>Clarification Request 25</b> Please revise the EF calculation procedure and update the EF, if necessary.	CR 25	<input checked="" type="checkbox"/>
E.4.9. In case of alternative weighing factors for the Combined Margin: Is the quantification of the alternative weighing factor justified in a suitable and transparent manner?	60	Please see the methodology for the calculation of CM EF for the Grid.		<input checked="" type="checkbox"/>

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E.4.10. In case of alternative weighing factors for the Combined Margin: Is the guidance for the PDD concerning the acceptability of alternative weights considered in the discussion?	60	No. Please refer to Tool to calculate the emission factor for an electricity system. See remarks above		<input checked="" type="checkbox"/>
<b>E.5. Difference between E.4. and E.3 representing the emission reductions of the project:</b>				
E.5.1. Are formulae required for the determination of emission reductions correctly presented?	60	Yes. But see remarks above		<input checked="" type="checkbox"/>
<b>E.6. Table providing values obtained when applying formulae above:</b>				
E.6.1. Will the project result in fewer GHG emissions than the baseline scenario?	60	Yes.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
E.6.2. Is the form/table required for the indication of projected emission reductions correctly applied?	60	Yes. But see the EF consideration	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
E.6.3. Is the projection in line with the envisioned time schedule for the project's implementation and the indicated crediting period?	60	Yes.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
E.6.4. Is the data provided under this section in consistency with data as presented by other chapters of the PDD?	60	See CRs above	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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<b>F. Environmental impacts</b>				
<b>F.1. Documentation on the analysis of the environmental impacts of the project, including transboundary impacts, in accordance with procedures as determined by the host Party:</b>				
F.1.1. Has an analysis of the environmental impacts of the project activity been sufficiently described?	5,12	EIA report to be provided. See remarks in <b>CR#6</b> .	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
F.1.2. Are there any Host Party requirements for an Environmental Impact Assessment (EIA), and if yes, is an EIA approved?	5,12	The project has to fulfill the environmental legislation. The pre-license has been issued upon the Environmental Impact Study submitted to the Ministry of Environment, who is also in charge as NFP: See the discussion in the Barrier Analysis	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
F.1.3. Will the project create any adverse environmental effects?	5,12	<b>Clarification Request 26</b> Please provide evidence on possible impact on the bird routes shadow effect, noise pollution, electromagnetic radiation.	<b>CR 26</b>	<input checked="" type="checkbox"/>
F.1.4. Are transboundary environmental impacts considered in the analysis?	5,12	To be finalized after the submission of the documents.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>F.2. If environmental impacts are considered significant by the project participants or the host Party, provision of conclusions and all references to supporting documentation of an environmental impact assessment undertaken in accordance with the procedures as required by the host Party:</b>				
F.2.1. Have identified environmental impacts been addressed in the project design?	5,12	To be finalized after submission of the relevant documents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
F.2.2. Does the project comply with environmental legislation in the host country?	5,12	To be finalized after submission of the relevant documents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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CHECKLIST TOPIC / QUESTION	Ref.	COMMENTS	PDD in GSP	Final PDD
<b>G. Stakeholders' comments</b>				
<b>G.1. Information on stakeholders' comments on the project, as appropriate:</b>				
G.1.1. Have relevant stakeholders been consulted?	4,6,7	A public hearing regarding the impact of the Wind Farm was held. <b><u>Clarification Request 27</u></b> Please submit evidence on public hearing / stakeholder meeting and the comments.	CR 27	<input checked="" type="checkbox"/>
G.1.2. Have appropriate media been used to invite comments by local stakeholders?	4,6,7	See CR above		<input checked="" type="checkbox"/>
G.1.3. If a stakeholder consultation process is required by regulations/laws in the host country, has the stakeholder consultation process been carried out in accordance with such regulations/laws?	4,6,7	See remarks above		<input checked="" type="checkbox"/>
G.1.4. Is the undertaken stakeholder process described in a complete and transparent manner?	4,6,7	See remarks above		<input checked="" type="checkbox"/>
G.1.5. Is a summary of the stakeholder comments received provided?	4,6,7	See remarks above		<input checked="" type="checkbox"/>
G.1.6. Has due account been taken of any stakeholder comments received?	4,6,7	See remarks above		<input checked="" type="checkbox"/>

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<b>H. Annexes 1 – 4</b>					
<b>Annex 1: Contact Information</b>					
H.1.1.	Is the information provided in consistency with the one given under section A.3?	60	Yes		<input checked="" type="checkbox"/>
H.1.2.	Is information on all private participants and directly involved Parties presented?	60	See the CR#7 regarding the Trade Registry of the Project Participant.		<input checked="" type="checkbox"/>
<b>Annex 2: Baseline study</b>					
H.1.3.	If additional background information on baseline data is provided: Is this information in consistency with data presented by other sections of the PDD?	60	Yes. But see remarks on EF re-calculation.		<input checked="" type="checkbox"/>
H.1.4.	Is the data provided verifiable? Has sufficient evidence been provided to the determination team?	60	The data has to be revised according to the CR/CAR		<input checked="" type="checkbox"/>
H.1.5.	Does the additional information substantiate statements given in other sections of the PDD?	60	Yes. But see remarks on the revision of the baseline.		<input checked="" type="checkbox"/>
<b>Annex 3: Monitoring Plan</b>					
H.1.6.	If additional background information on monitoring is provided: Is this information in consistency with data presented by other sections of the PDD?	60	See section D.3	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
H.1.7.	Is the information provided verifiable? Has sufficient evidence been provided to the audit team?	60	See section D.3		<input checked="" type="checkbox"/>



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**Table 2 Resolution of Corrective Action and Clarification Requests – Cogealac Wind Power Plant Project**

Clarifications and corrective action requests by determination team	Ref. to table 1	Summary of project owner response	Determination team conclusion
<p><b><u>Clarification Request 1</u></b></p> <p>Further official ANRE documents regarding the remaining 60 MW capacity should be submitted. These documents have to be presented in English as well.</p>	A.1.1	Please see attached “CR 16 _ Status of WP Connection Contracts” ( <a href="http://www.transelectrica.ro">www.transelectrica.ro</a> )	<p>According to the submitted Excel table originated from the webpage of the grid operator Transelectrica, a list of licenses for wind power plants have been listed : For “Cogealac Wind Power Project”, the power capacity is given as 255 MW. The JI PDD v03 refers to 252.5 MW.</p> <p>Please refer to <b>FAR 1</b>. <b>Please refer to CR 28 and for the further process.</b></p>
<p><b><u>Clarification Request 2</u></b></p> <p>Please explain to which entity the PDD version 01 was submitted.</p>	A.1.3	Version 01 was an internal one, between the consultant and the project owner, i.e., it was submitted by GET-Carbon to Ovidiu Development (Sep 04 2009)	<p>The JI PDD version 02 was submitted before onsite assessment to the audit team. The issue is closed.</p> <p style="text-align: right;"><input checked="" type="checkbox"/></p>

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<p><b><u>Clarification Request 3</u></b></p> <p>Please check the PDD against the most updated relevant methodologies / tools / guidelines regarding baseline and monitoring, grid emission factor, remaining life-time, plant load factor and additionality.</p>	<p>A.1.3.</p>	<p>We stress that this JI project activity applies current JISC regulations with respect to defining transparent <b>baseline and monitoring criteria</b>. In particular, by opting for section B. 10 (a) of the relevant JISC guidelines (i.e., Guidance on criteria for baseline setting and monitoring, vs .02, JISC18), we have elected to follow a JI-specific approach, rather than to apply a CDM approach (see submitted PDD, pg.13).</p> <p>Option B.10(a) allows us to use our own methodology, or even use parts of CDM methodologies, as appropriate, and as long as the JISC guidelines—in particular section C.5(28) and Annex 1. (2) on baseline and additionality—are respected.</p> <p>To this end, and consistently with previously registered JI projects in Romania, we have chosen to use as a source for the baseline and monitoring criteria CDM ACM0002 vs.10, together with the CDM additionality tool vs. 05.2. On this basis, we have developed and implemented our own specific approach.</p> <p>In order to improve clarity of the PDD, we have improved language to this end, and have better detailed where our JI-specific approach differed from the full CDM methodology. Divergence occurred in defining and computing the EF for the power grid in Romania; in using only the CDM additionality tool associated with the methodology and not others, since these apply to situations that are not relevant to JI projects in Romania—with respect to analyses</p>	<p>Regarding the determination of the baseline, the JI project referred to is “ The combined heat and power rehabilitation at CET Timisoara Sud”. This project utilizes the generated steam in a new installed 18 MW steam turbine in order to cover the heat demand and the internal electricity demand (cogeneration). The excess electricity will be supplied to the Grid. The project’s main scope is to implement energy efficiency measures in heat (steam, hot water) supply.</p> <p>The cogenerated electricity helps to reduce the operation costs of the plant and GHG emissions at the Grid. It must be stated that the CET Timisoara Sud is fuelled with lignite, i.e. ACM 0002 is not applicable.</p> <p>Nevertheless tools linked with ACM0002 can be utilized : “Tool to calculate the emission factor for an elec-</p>
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	<p>related to excess capacity, etc.</p> <p>Finally, in terms of determining the <b>most likely baseline scenario</b> and EF factor, and again following JISC guidelines C.5(28) and Annex I (2), <b>we have used in part information from a previously determined JI project in Romania (Timisoara Centru; see attached PDD and LoA)</b>. Specifically, both the Timisoara and Cogealac Projects generate electricity into the National Grid; have similar status as priority electricity production; and replace electricity produced from fossil fuels. Indeed, it was determined for Timisoara Centru that its baseline scenario is the "business as usual" case, i.e., electricity generation of equivalent amounts using the current mix.</p> <p>The Cogealac PDD demonstrates this by using the additionality tool --using the findings related to determination of the Timisoara JI project. Indeed, version 05.2 of the tool states that for projects referring to ACM0002, documenting only one alternative scenario is sufficient to demonstrate additionality.</p> <p>To this end, according to JISC guidelines: "Provision of traceable and transparent information that an accredited independent entity has already positively determined that a comparable project (to be) implemented under comparable circumstances (same GHG mitigation measure, same country, similar technology, similar scale) would result in a reduction of anthropogenic emissions by sources or an enhancement of net anthropogenic removals by sinks that is additional to any that would otherwise</p>	<p>tricity system"</p> <p>Please refer to : B1., PDD section 5.2.2. Baseline study). The result is that BM is negligible.</p> <p>The calculations have been done in 2005, the assumptions for energy mix-supply-demand - are based on estimates.</p> <p><b>Please refer to CR 29 for the further process.</b></p>
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		<p>occur and a justification why this determination is relevant for the project at hand.”</p> <p>In conclusion, we trust we have followed JISC regulations in setting the project’s baseline and monitoring methodology. Recognizing that the JI process is relatively new with respect to the CDM, we have added text in the PDD to clarify the process followed in applying a CDM methodology as guidance within our JI specific approach.</p>	
<p><b><u>Clarification Request 4</u></b></p> <p>Please indicate a unique start-up date for the project activity in the PDD and the relevant documents.</p>	A.1.4.	Corrected.	<p>The startup date of the wind power plant operation is indicated as April 01, 2011.</p> <p>The issue is closed.</p> <p><input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 5</u></b></p> <p>Please submit further documents for cross check / review :</p> <ul style="list-style-type: none"> <li>- Micrositing Report (as presented during the onsite audit)</li> <li>- Civil Works Permission / License</li> <li>- Contract on High Voltage transmission line works from the Cogealac Wind Power Plant sub-station to 400kV Grid</li> </ul>	A.2.2	<p>Please see attached CR5 _ Wind Assessment</p> <p>Civil works Permission not issued yet. Please see attached the application CR5 _ Application for Civil Works Permission _Cerere pentru obtinerea aut.de construire_EN</p> <p>Contract under preparation</p>	<p>Micro-siting Report is submitted.</p> <p>Permits for construction works has been applied on 22.07.2009.</p> <p>The contract on HV transmission works has not been submitted.</p>

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<ul style="list-style-type: none"> <li>- ODA Declaration</li>   <li>- The Govt. Decree on Green Certificates (<a href="http://www.opcom.ro">www.opcom.ro</a>)</li>   <li>- Information on Green Investment Scheme (GIS) participation</li>   <li>- English summary of Law 220 (2008)</li>   <li>- Environmental Impact Assessment Study/Report with English summary</li>   <li>- Further EIA related documents - Biodiversity study/report</li>   <li>- Evidence on the early consideration of Carbon Credits by the Project Participant in re-</li> </ul>		<p>CR5_ODA Declaration</p> <p>CR5 _ Description of Law 220 included in _ Wolf_Theiss_Guide_to_Renewable_Energy_Sources</p> <p>No GIS projects was promoted in Romania so far.</p> <p>See above</p> <p>Provided during the site visit. Translated Summary to be provided after June 21, 2010</p> <p>As a JI project, it is felt that the JI rules specifically require that a EIA be applied for, and receive government approval, showing that all environmental requirements are satisfied as stipulated by national law. The results of the EIA were accepted by the NCCC, including conclusions on biodiversity impacts.</p> <p>Evidence of early consideration of Carbon Credits is provided with this submission as CR5_MoM. Please also see documentation provided under CAR 1.</p>	<p>ODA Declaration has been submitted (24.05.2010)</p> <p>The directives and regulations have been summarized in Wolf Theiss Renewable Guide for Southeastern Europe, pp. 146-157.</p> <p>resolved</p> <p>resolved</p> <p>EIA with English summary has not been submitted.</p> <p>Resolved</p> <p>Early JI consideration has been provided and listed in the project time-table, section B.2., JI PDD.</p>
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<p>gards with the project implementation</p> <ul style="list-style-type: none"> <li>- Single Line Diagram (including the position of meters)</li> <li>- Certificates on Training and Qualification of Wind Power Plant Technical Staff (High Voltage, WTG service &amp; maintenance)</li> </ul> <p>Organisation Chart with job description</p> <ul style="list-style-type: none"> <li>- Report on Local Stakeholder meeting (2009) translated in English</li> <li>- Board Decision on considering the JI ERU revenues</li> </ul>		<p>Single line diagram was provided during TUV SUD's visit (please see attached CR5 _ Single Line Diagram _ Schema de Principiu retele 110kV)</p> <p>Certificates on Training and qualification of technical staff etc. will be prepared in time to obtain license to operate CWPP. Indeed, they are required by law—therefore they will be produced at the appropriate time. They do not need to be ready at this time.</p> <p>Attached.</p> <p>Attached.</p> <p>Document Provided; CR5_MoM</p> <p>was provided during TUV SUD's visit; translation attached</p>	<p>Single line diagramme has been submitted.</p> <p>See <b>FAR2 for further process</b></p> <p>A Quality Management handbook (HB) describing the organization, job description, plant and data management has been provided (O&amp;M).</p> <p><b>Stakeholder meeting on 10.06.2008</b> about the JI project (document is available in Romanian)</p> <p>Resolved, see above</p>
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<p>- Grid connection and Usage Agreement with Transelectrica, including a summary in English (3 pages as indicated onsite)</p> <p>- Operational Procedures on Plant Operation and Data Management</p> <p>- Information on SCADA system implementation (by WTG supplier)</p> <p><b>- Contract on the Emergency Gen-Sets product specification</b></p>		<p>Attached.</p> <p>SCADA systems submitted CAR5__SCADA</p> <p>There are no contracts stipulated yet at this point. The emergency gen-sets will be implemented in time for application towards obtaining the operating license, i.e., over the next several months. We hereby attach relative product specifications as used for similar purposes.</p>	<p>Grid Connection and Usage Agreement provided (document is available in Romanian). resolved See Handbook (provided)</p> <p>A SCADA system for data acquisition and management has been described in detail.</p> <p>Technical information on the planned emergency Gen-Set, e.g. two versions have been (45 KVA and 50 kVA) provided. Supplier is Caterpillar – Olympian.</p> <p><b>Please refer to CR 30 for the further process.</b></p>
<p><b><u>Clarification Request 6</u></b></p> <p>Please indicate the plant capacity as given in the supply contract with GE.</p>	<p>A.2.4.</p>	<p>Plant capacity as it is in the supply agreement is <math>2.5 \times 10^1 = 252.5</math> MW</p>	<p>The WTG Supply Contract indicating 252.5 MW capacity has been submitted. The issue is resolved.</p> <p style="text-align: right;"><input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 7</u></b></p> <p>Please submit the Trade Registry (with Eng-</p>	<p>A.3.1.</p>	<p>Please see attached CR7_ Incorporation Cert _ Certificat constatator Ovidiu Development-1_EN</p>	<p>Updated Trade registry from 26.03.2010 has been sub-</p>

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<p>lish translation of the relevant section) for Ovidiu Development SRL. The shareholder/ownership issue should be indicated clearly.</p> <p>Furthermore the due-diligence report regarding the Cogealac Wind Power Project should be submitted (with English translation summary).</p>		<p>The micro-siting component of the due diligence report has been shown during the site visit.</p>	<p>mitted.</p> <p>The Due Diligence report of CUBE has been submitted. See additionality discussion (step 3a). The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 8</u></b></p> <p>Please submit a declaration by the involved Parties on their involvement as a “Project Participant”. Please submit evidence on the ERU transfer from Romania to Netherlands.</p>	<p>A.3.2</p>	<p>Project Participants are specified in the revised PDD as Ovidiu Development (RO) and CEZ (NL). The DFP has clarified that specification in the PDD of a JI partner outside Romania--together with a draft determination report-- is sufficient to issue a LoA. Successively the Netherlands will issue their own LoA for the non-Romanian JI partner. Please also see art. 6, para 3 of the Kyoto Protocol and attached LoA issued for Timisoara Centru project.</p> <p>We are also attaching a preliminary agreement between the project participants towards an ERPA.</p>	<p>The JI PDD has been revised. The ERPA accord indicates both Ovidiu and CEZ as project participants.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 9</u></b></p> <p>Please submit a table with the geographic coordinates and GPS coordinates of each WTG unit.</p>	<p>A.4.1.1.</p>	<p>Please see attached CR9_WTGs coord _ Pozitii turbine si statii Cogealac Stereo70</p>	<p>An excel workbook with WTG coordinates has been submitted.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>



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<p><b><u>Clarification Request 10</u></b></p> <p>Please submit evidence (supplier feedback) on the operation life time of the wind power plant. Refer to the relevant guide in the UNFCCC methodologies.</p>	<p>A.4.2.6</p>	<p>GE and most other companies do not clearly specify lifetimes for their turbines. Thus according to EB50 Annex 15, as new turbines are to be installed, we are using a default value of 25 years.</p>	<p>The assumption of 25 years for technical installations is reasonable.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 11</u></b></p> <p>Please submit the training programme on the staff in charge of WTG and HV units.</p>	<p>A.4.2.7</p>	<p>It is felt that this CR is not relevant for the JI aspect of the project. However it is noted that, in order for the Company to receive its operating License (after commissioning of all turbines), it will need to demonstrate its capacity to operate - Romanian Licensing Regulation (attached "CR11 _ Licensing Regulation_ Regulament pentru acordarea licentelor si autorizatiilor in sectorul energiei electrice 2004") states in art. 17, the evidences needed for Licensing; amongst them, Organizational Chart, CV and qualification of personnel, QA&amp;QC and operation procedures, business plan. All the documents required by law are being prepared but will be submitted at the licensing stage.</p>	<p>The issue has been addressed. See <b>FAR2, CR5.</b></p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

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<p><b><u>Clarification Request 12</u></b></p> <p>Please provide detailed evidence on the calculation procedure of EF within the Timisoara CET SUD project (excel workbook). Furthermore, the LoA for Timisoara CET SUD is requested.</p>	<p>A.4.3.1.</p>	<p>Please see above, CR3.</p> <p>LoA and PDD of the Timisoara Centru project are attached; During the site visit the discussions on the issue concluded that no excel workbook was necessary, as Cogealac adopts an ex-post approach, using the ex-ante EF factor only to estimate ERs.</p> <p>According to DFP, successful determination of a JI project by an accredited AIE implies the recognition and implementation of procedures used in that project, including those developed for the calculation of the ex-ante EF at national level; the institutions involved in the endorsement of the EF determined in Timisoara Centru, and applied by Cogealac in its PDD, are ANRE, ANPM, and the Ministry of Environment. <b>The first year for the calculation is 2010</b>, based on data available by March 31, 2011.</p>	<p>The issue has been discussed in the context of <b>CR29</b>.</p> <p>The issue is closed. <input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 13</u></b></p> <p>Please revise the PDD according to the updated baseline &amp; monitoring methodology ACM 0002, v11.</p>	<p>B.1.1.</p>	<p>Please see above; CR3.</p>	<p>Please refer to <b>CR29</b>.</p> <p>The issue is closed. <input checked="" type="checkbox"/></p>

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<p><b><u>Clarification Request 14</u></b></p> <p>Please discuss alternatives according to the Additionality Tool details. Furthermore the Guidelines on Barrier Analysis from EB 50, annex 13 have to be taken into consideration.</p>	<p>B.2.1.</p>	<p>See CR3</p>	<p>Step 1 is not discussed according to the Additionality Tool.</p> <p><b>Please refer to CR31 for the further process.</b></p>
<p><b><u>Clarification Request 15</u></b></p> <p>Please discuss other revenues like Green Certificates, which are based upon the Law 220/2008 and guarantee a feed-in tariff of Euro 27.--/MWh to Euro 55.--/MWh for the renewable energy.</p>	<p>B.2.4</p>	<p>There is no feed in tariff in the Romanian National Power Grid.</p> <ul style="list-style-type: none"> <li>- The only RES promotion system is the mix between the Green Certificates (granted by Law 220) and the Mandatory quotas (for the electricity distribution companies. Neither system can be relied upon for a guaranteed stream of income. First, the green certificate system is not yet fully applied and in fact it is currently under revision.</li> <li>- Secondly, the Mandatory quotas may be modified retroactively by ANRE for the preceding year (Law 220/2008, art 4, para 7; GD 1538/2008). For instance, the quota for year 2009 was established in 2008 at 6.28% by Law 220/2008; yet in 2009 ANRE modified the quota to 0.589% --about 10 times lower-- through Order 97/2009 (attached "Guidelines for the producer of electricity from RES"). This flexibility, granted to ANRE to diminish the pressure on distributors to buy, translates into incertitude for RES projects income streams.</li> </ul>	<p>According to the presented information, there is no feed-in tariff implementation in Romania.</p> <p>The issue is resolved.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

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<p><b>Clarification Request 16</b></p> <p>Please submit detailed evidence on all wind power plants - planned and/or operational - with public Grid connection.</p>	<p>B.2.</p>	<p>Please find attached the “CR 16 _ Status of WP Connection Contracts” as of May 04, 2010 (<a href="http://www.transelectrica.ro">www.transelectrica.ro</a>). <b>About 2623 MW have connection contracts insured.</b> 255 MW is the biggest proposed wind park.</p>	<p>According to the Excel table from the updated webpage of the grid operator Transelectrica, the total capacity of the approved wind power projects is 2623 MW. The projected installed capacity in the region of Dobrogea and Tulcea is 2150 MW, around 82% of the total projected wind power capacity in Romania.</p> <p>Some of the licensed wind power projects are of comparable size with the Cogealac project :</p> <ul style="list-style-type: none"> <li>- 255 MW Fantanele West</li> <li>- 150 MW Pantelimonu</li> <li>- 204 MW Pestera</li> </ul> <p>Others have considerable high capacities as well :</p> <ul style="list-style-type: none"> <li>- 90 MW Fantanele Est</li> <li>- 90 MW Pestera</li> </ul>
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			<p>Compared to the operational grid capacity of around 6500 MW, the wind power plants seem to dominate the energy sector in the future, making around 40% of the presently installed grid capacity.</p> <p><b>Please refer to CR 32 for the further process.</b></p>
<p><b><u>Clarification Request 17</u></b></p> <p>Please explain, how on the one hand conditions for investors were getting attractive since EU membership of Romania in 2007, and in contrary the Ovidiu Development SRL <b>was facing finance barriers.</b></p>	<p>B.2.12</p>	<p>Project investors' and financial institutions' interest in the development opportunities in Romania grew in the run up period leading to Romania joining the EU in 2007.</p> <p>The EU membership of Romania in 2007 imposed to Romania to follow some directions, one of them being supplying part of its electricity from renewable sources.</p> <p>The disadvantage of the renewable sources compared to the fossil and nuclear is that they cannot be economically without an incentive from the state.</p> <p>In this respect, Romania had to adopt and implement a regulatory framework (primary and secondary) to enable some incentive scheme.</p>	<p>The Excel table (<b>CR16</b>) indicates a licensed wind power capacity of 2623 MW. Detailed information on the financing of these wind power projects is missing.</p> <p>As mentioned above, there are many other wind power projects, which face similar barriers:</p> <ul style="list-style-type: none"> <li>- size</li> <li>- financial risk</li> <li>- electricity market trend</li> </ul>

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		<p>The framework was defined by the Law 220 / 2008, which was approved but the secondary regulation (defining procedures to apply the Law) is still missing so the Law cannot be fully applied.</p> <p>Cogealac faced unique problems as a renewable wind park project. These were due to:</p> <ul style="list-style-type: none"> <li>• its size -- among the largest among those being proposed for funding-- implying that many uncertainties associated to technical risk existed.</li> <li>• Just as importantly, the development plans of the owners --who sought to bundle two large projects into one package offered internationally through a tender--led to low interest from project investors. Indeed, the buyer of Ovidiu Development, CEZ, agreed to buying the joint package on condition that the most uncertain of the two projects in it (i.e., Cogealac, which was not even under development at the time of purchase) be implemented as a JI project, using carbon income as a means to lessen the investment risk.</li> <li>• The technical grid connection solution (i.e. to connect to Transelectrica 400 KV lines) implied also the building of a Main Transformer Station, which increased the costs of the project</li> </ul>	<p><b>Please refer to CR 33 for the further process.</b></p>
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		<ul style="list-style-type: none"><li>• On top of that, by connecting to 400 KV through a Main Transformer Station implies additional internal technical losses in the transformer, losses that have to be supported by Cogealac</li><li>• Finally, international and national market conditions became worse from mid-2008 onward (ex: both consumption and marginal prices of electricity dropped significantly), and made project implementation of Cogealac much less attractive, compared to projects that had secured financing earlier on.</li></ul>	
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<p><b>Clarification Request 18</b></p> <p>Please explain, how other existing wind power plants were implemented without the JI ERUs.</p>	<p>B.2.14</p>	<p>Most part of the projects implemented so far in the Romanian NPG using wind benefit from different forms of help, either from EU funding (<a href="http://oie.minind.ro/">http://oie.minind.ro/</a>), or from national funding (The Romanian Environmental Fund) (<a href="http://www.afm.ro/proiecte04_aprobate_ca.php">http://www.afm.ro/proiecte04_aprobate_ca.php</a>); Please find attached “CR18 List of beneficiaries of Structural Funds” and CR18 List of projects approved by the National Environmental Fund Administration</p>	<p>These sources present various implemented projects with funding from EU or National funding.</p> <p><b>Please refer to CR34, CR35 for the further process.</b></p>
<p><b>Clarification Request 19</b></p> <p>Please revise the <b>Common Practice Analysis</b> according to the Additionality Tool and mention other similar existing project activities</p>	<p>B.2.15</p>	<p>We have revised common practice analysis for improved clarity. We note that common practice analysis, by definition, must be <b>based on operational plants</b>.</p>	<p>The Common Practice Analysis has been carried out due to 2008 data, which does not reflect the present situation. The JI PDD has been completed by the end of 2009 and the onsite assessment was in April 2010.</p> <p>Please refer to Clarification Requests raised in <b>CR 32, CR 33, CR 34, CR 35</b>.</p> <p><b>Please refer to CR36 for the further process.</b></p>



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<p><b><u>Clarification Request 20</u></b></p> <p>Please explain the justification for this investment considering the fact that the Grid has excess capacity.</p>	<p>B.2.17</p>	<p>The main driver for investment is <b>based on the hope</b> that there will be a strong RES market in Romania and in the region, in the context of the EU policy in the field.</p> <p>Without additional incentives, such as those coming from the JI market, the investment may be easily postponed, due many existing regulatory uncertainties and/or unfavorable regulations. For instance, the recent evolutions of the Romanian RES legal framework; GD 1479/2009, states that the electricity generated from the RES must be traded on the day ahead segment of the market (which represents a very small portion of the market).</p> <p>Additionally, the wind farm Cogealac is a controllable resource over 10 MW and, according to the Law, such a controllable RES over 10 MW has to pay also TG (Transmission Grid Fee).</p>	<p>Considering the fact that the grid has excess capacity and the electricity from the renewable sources does not get a premium, the investor takes a risk regarding the financial feasibility of the Cogealac project.</p> <p>On the other hand, the investment in wind power plants in the region shows, that other companies take a risk as well.</p> <p>See remarks in <b>CR 32 - CR 36</b>.</p> <p><b>Please refer to CR 37 for further process.</b></p>
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<p><b><u>Clarification Request 21</u></b> Please refer to "Priority RE 2006" sent by mail Ordin ANRE 39/2006</p>	<p>B.2.17</p>	<p>Please see attached "CR21 _ Ord 39 06RegCalif2006"</p>	<p>The document presents : Rules for qualification of priority electricity production from renewable sources of energy and the decision of this rules by the Romanian Energy Regulatory Authority</p> <p>The issue is closed. <input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 22</u></b> Please submit an Operational Procedure (OP) regarding the Data Management (to be submitted).</p>	<p>D.2.1.</p>	<p>Attached</p>	<p>The issue has been addressed, see <b>CR30, FAR2.</b></p> <p>The issue is closed. <input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 23</u></b> Please submit the Organisation Chart of the Plant Management with job description</p>	<p>D.3.1.</p>	<p>Please see above CR11.</p>	<p>The issue has been addressed, see <b>CR30, FAR2.</b></p> <p>The issue is closed. <input checked="" type="checkbox"/></p>

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<p><b><u>Clarification Request 24</u></b></p> <p>Please indicate the Plant Load factor precisely and submit the micrositing report.</p>	<p>E.4.6.</p>	<p>There are different estimations regarding the capacity factor of the wind farm. According to the Due Diligence report, the CF and the probability associated are presented as follows:</p> <table border="1" data-bbox="974 496 1339 678"> <tr> <td><b>CF<sub>gross</sub></b></td> <td><b>0.360</b></td> </tr> <tr> <td><b>CF<sub>net, P50</sub></b></td> <td><b>0.333</b></td> </tr> <tr> <td><b>CF<sub>net, P75</sub></b></td> <td><b>0.284</b></td> </tr> <tr> <td><b>CF<sub>net, P90</sub></b></td> <td><b>0.240</b></td> </tr> </table> <p>The PDD employs the CF at P50, using a value of 0.333. (OS, VS)</p>	<b>CF<sub>gross</sub></b>	<b>0.360</b>	<b>CF<sub>net, P50</sub></b>	<b>0.333</b>	<b>CF<sub>net, P75</sub></b>	<b>0.284</b>	<b>CF<sub>net, P90</sub></b>	<b>0.240</b>	<p>The capacity factor (plant load factor) has been determined in the Due Diligence report.</p> <p>The issue is closed.</p> <p style="text-align: right;"><input checked="" type="checkbox"/></p>
<b>CF<sub>gross</sub></b>	<b>0.360</b>										
<b>CF<sub>net, P50</sub></b>	<b>0.333</b>										
<b>CF<sub>net, P75</sub></b>	<b>0.284</b>										
<b>CF<sub>net, P90</sub></b>	<b>0.240</b>										
<p><b><u>Clarification Request 25</u></b></p> <p>Please revise the EF calculation procedure and update the EF, if necessary.</p>	<p>E.4.8.</p>	<p>See CL12. Our approach for the EF calculation is ex-post, based on independently verified emissions data in Romania, performed under the EU-ETS rules.</p> <p>EF will be calculated and published at national level, as mentioned in the PDD and confirmed by the Romanian DFP during the meeting in Bucharest. As discussed in the PDD, we furthermore note that the ex-ante EF used for estimation of the emissions reduction is more conservative than the likely ex-post EF, as calculable based on the most recent ANRE data.</p>	<p>The JI specific approach for EF calculation (ex-ante) has been discussed in detail, see CR3.</p> <p>Please refer to <b>CR29</b>.</p> <p>The issue is closed.</p> <p style="text-align: right;"><input checked="" type="checkbox"/></p>								

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<p><b><u>Clarification Request 26</u></b></p> <p>Please provide evidence on possible impact on the bird routes shadow effect, noise pollution, electromagnetic radiation.</p>	<p>F.1.3.</p>	<p>Please refer to the EIA prepared to obtain environmental permits under Romanian law. By Law, Ovidiu was required to assess mentioned impact on birds, shadow effect and noise pollution, but not electromagnetic radiation. The Romanian DFP accepted the EIA as a base to provide its LoE and eventually its LoA. The JI project does not require us to assess these additional impacts, although Ovidiu Dev. management is committed, and will consider seriously, to monitor these parameters during the operation of its park.</p>	<p>It has been demonstrated that the issues were handled in the Environmental Impact study and accepted by the Romanian DFP.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 27</u></b></p> <p>Please submit evidence on public hearing / stakeholder meeting and the comments.</p>	<p>G.1.1.</p>	<p>Please see CR5</p>	<p>The issue has been addressed above, see <b>CR30</b>.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

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<b>Clarifications and corrective action requests by determination team</b> 2 <sup>nd</sup> loop revised after PP response on 10-09-2010	<b>Ref. to table 1</b>	<b>Summary of project owner response</b>	<b>Determination team conclusion</b>
<p><b>Clarification Request 28</b></p> <p>For “Cogealac Wind Power Project”, the power capacity in the Transelectrica Excel sheet (dated May 04, 2010) is indicated as 255 MW. The JI PDD v03 refers to 252.5 MW. Please clarify. Furthermore the set-up authorization for the wind power plant should be submitted.</p>	<p>A.1.3.</p>	<p><b>Attached set-up Authorization for 97 WTGs.</b></p> <p>The PPs are firmly intent on obtaining permissions for the capacity stated in the PDD, i.e., 252.5 MW, corresponding to 101 turbines.</p> <p>The discrepancy between 255 and 252.5 MW is due to the following. During the design process, a PP can merely estimate the capacity of the park. The final layout will depend on a series of constraints like land availability, environmental issues, grid connection restrictions etc.. To this end, in order to be on the safe side, the PP decided to secure access to the grid by signing a contract for a larger –rather than a lesser—number of intended turbines. In fact, the actual layout of 252.5MW contains one WTG less than asked for in the permit, i.e., less than a 1% difference.</p> <p>The proven success of the PP in obtaining successive permits with increasingly higher numbers of WTGs, proves both the intention and the ability of the PP to move towards its stated goal of obtaining a final permit for 101 WTGs. We thus suggest to keep this value in the PDD and that a FAR be raised with regards to this issue.</p>	<p>According to the license procedures of the grid operator Transelectrica in Romania, the acquired license capacity may vary at the implementation phase, depending on the HV grid connection capacity and other obstacles.</p> <p>See <b>FAR1</b>.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

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<p><b><u>Clarification Request 29</u></b></p> <p>Regarding the baseline scenario, please check the assumptions on energy mix-supply-demand made in the reference JI project (CET Timisoara Sud, January 2006) and update the EF calculations in case of Cogealac Wind Power Project.</p>	<p>A.1.3.</p>	<p>We would like to clarify that the EF value used in the PDD to estimate ERs is from Timisoara Centru (Not Timisoara Sud). We further note the following:</p> <p>1) Additional computations made in the PDD, independently of the Timisoara PDD, i.e., using most recent ANRE data, show that this EF value is conservative; and</p> <p>2) The actual ERs are to be determined via new, ex-post EF values. These will be provided by the government of Romania using real-time data.</p> <p>Finally, we attach Baseline Study for Timisoara Centru in order to highlight the Electricity Mix and its assumptions.</p>	<p>The submitted baseline report of <b>Timisoara Centru</b> cogeneration project with grid connection has been cross checked. The baseline considerations regarding the Romanian Power Grid were found to be consistent.</p> <p>Furthermore the PDD demonstrated that <b>the ex-ante chosen EF=0.833 is less than</b> the calculated ANRE data EF=0.91 as indicated in Table B.2.1., PDD.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Clarification Request 30</u></b></p> <p>Please submit :</p> <ul style="list-style-type: none"> <li>-the contract on High-Voltage Transmission works</li> <li>- EIA with English summary</li> </ul>	<p>A.2.2.</p>	<p>The project will deliver electricity to the Grid based on an agreement signed on May 21, 2008 between Ovidiu Development and Tomis Team—the latter being the owner and provider of the connection rights to the 110 kV power station in Tariverde. Please find attached copy of relevant pages of the Agreement: “CR3_ Power Evacuation Agreement”</p> <p>Please find attached “CR3 _ EIA _ english summary”</p>	<p>The submitted contract on power transmission and the EIA study by a Third Party were found to be consistent.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

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<p><b><u>Clarification Request 31</u></b></p> <p>Please discuss other plausible feasible alternatives to the project activity.</p>	<p>B.2.1.</p>	<p>As per the requirements of the latest CDM additionality tool (vs. 5.2), the identification of the alternative scenarios can stop when at least one feasible alternative, more attractive than the proposed project activity, is identified. Specifically the tool states:</p> <p>(4) Project activities that apply this tool in context of approved consolidated methodology ACM0002, only need to identify that there is <b>at least one credible and feasible alternative</b> that would be more attractive than the proposed project activity.</p> <p>With respect to (4) above, the PDD has identified this credible alternative as “business as usual.”</p> <p>Furthermore, we submit that, at least during the crediting period, there is no other more attractive scenario than the continuation of the current situation, as no investment is required for covering up the load curve. This is supported by considering that <b>there is significant over-installed capacity in the Romanian Power Grid</b> : as per ANRE 2009 Annual Report (pg. 9-11), total installed capacity is: 20411 MW, while total final consumption is 41583 GWh.</p>	<p>With reference to the Additionality Tool, the PP has demonstrated that the continuation of the current situation, i.e. the purchase of electricity from the public Grid, would be a feasible alternative to the proposed project activity.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
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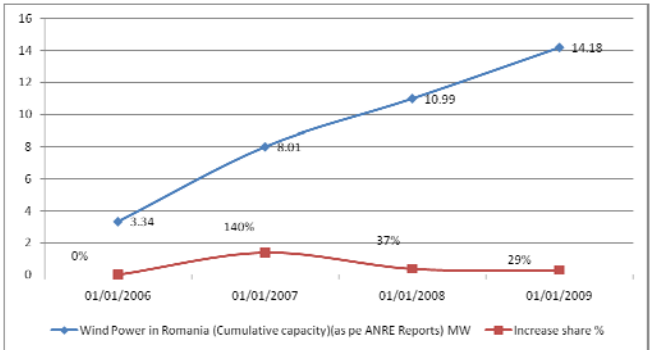
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<p><b>Clarification Request 32</b></p> <p>Please indicate in the presented Excel table on the licensed Wind power projects (provided by Transelectrica) the operation start-up dates with supply to the grid.</p>	<p>B.2.</p>	<p>The requested information is not publicly available for either operational or currently planned wind parks. The only available information is the excel Table in object (Transelectrica webpage).</p> <p>As discussed in the PDD, and now better highlighted in its revision, the majority of the operational projects came online in the period 2006 – 2009. Their average grid supply was 13,689 MWh/year, as shown in the chart below –based on ANRE data. The same chart also demonstrates the slowdown in the commissioning of wind power projects in 2008 and 2009 –compared to 2007.</p>  <table border="1"> <caption>Wind Power in Romania (Cumulative capacity) and Increase share %</caption> <thead> <tr> <th>Date</th> <th>Wind Power in Romania (Cumulative capacity) (as per ANRE Reports) MW</th> <th>Increase share %</th> </tr> </thead> <tbody> <tr> <td>01/01/2006</td> <td>3.34</td> <td>0%</td> </tr> <tr> <td>01/01/2007</td> <td>8.01</td> <td>140%</td> </tr> <tr> <td>01/01/2008</td> <td>10.99</td> <td>37%</td> </tr> <tr> <td>01/01/2009</td> <td>14.18</td> <td>29%</td> </tr> </tbody> </table>	Date	Wind Power in Romania (Cumulative capacity) (as per ANRE Reports) MW	Increase share %	01/01/2006	3.34	0%	01/01/2007	8.01	140%	01/01/2008	10.99	37%	01/01/2009	14.18	29%	<p>According to the project participant, this information is not publicly available.</p> <p>The request was raised as to identify the operational wind power plants, which have not applied for JI and are supplying the grid since 2006. According to the project participant, this information is not available for the public.</p> <p>Regarding the status of</p> <ul style="list-style-type: none"> <li>- Fantanele Vest 255MW and</li> <li>- Fantanele Est 90MW, please see remarks in <b>CR33</b>.</li> </ul> <p>The issue is closed.</p> <p style="text-align: right;"><input checked="" type="checkbox"/></p>
Date	Wind Power in Romania (Cumulative capacity) (as per ANRE Reports) MW	Increase share %																
01/01/2006	3.34	0%																
01/01/2007	8.01	140%																
01/01/2008	10.99	37%																
01/01/2009	14.18	29%																



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<p><b>Clarification Request 33</b></p> <p>Please indicate in the Excel table those projects with JI consideration or other means of project finance (funds).</p> <p>Please provide evidence on the finance of other wind power projects with similar capacities, i.e. :</p> <ul style="list-style-type: none"> <li>- 255 MW Fantanele West</li> <li>- 150 MW Pantelimonu</li> <li>- 204 MW Pestera</li> <li>- 90 MW Fantanele Est</li> <li>- 90 MW Pestera</li> </ul> <p>are going to be implemented despite of these barriers and without ERUs.</p>	<p>B.2.12.</p>	<p>Please find attached the table «<b>Wind parks with grid connection contracts_20100817</b>», indicating the wind parks that received an LoE from the Romanian DFP. Several wind projects applied for the LoE and received it; in fact, as per the attached "CR6_List of LoEs &amp; LoAs 2005 - 2010 _Lista_scrisori_2005-2010", <b>six out of 15 projects (40%)</b> that received DFP support during the most recent 3 – 4 years are wind power projects, specifically:</p> <ul style="list-style-type: none"> <li>14. Proiectul de energie eoliana la Pestera si Valea Dacilor</li> <li>21. Construirea a patru (4) parcuri eoliene de 10 MW in regiunea Constanta</li> <li>22. Mireasa Wind Park</li> <li>23. Cogealac – Construire si exploatare parc eolian</li> <li>25. Centrala electrica eoliana cu o putere instalata de 9 MW, Oravita</li> <li>28. Parcul Eolian Casimcea - Alpha</li> </ul> <p>The mentioned evidence demonstrates the need for JI support in the Romanian wind power sector, based on poor financing conditions for wind power in Romania.</p> <p>With regards to the second part of CR6, we submit that <b>no public information is available on the financing structure of the wind projects listed therein</b>. We also note that none of these projects is operational.</p>	<p>Evidence on wind power project activities with JI status have been submitted. Six wind power projects have been accepted by the DFP as JI project activity.</p> <p>According to the information given by the project participant, no details on the implementation and finance of these six wind power projects is publicly available.</p> <p>Due to excess grid power capacity and the present economic conditions, the timeline regarding the implementation of the total licensed wind power capacity of 2623 MW cannot be predicted.</p> <p>As pointed out by the project participant, information on Fantanele wind power projects is available. The Fantanele wind power projects were implemented before Cogealac WPP</p> <p style="text-align: center;"><b>See CAR 8 for further process.</b></p>
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		<p>*The only information we can provide is with regards to Fantanele, given some shared ownership structures with Cogealac. In the PDD, we had already discussed that the Fantanele wind park was financed before Cogealac, at a time when the economic situation in Romania was very different. Furthermore, we note that despite better initial economic conditions, also Fantanele applied for the JI status in 2009, as a way to improve its finances. The Romanian DFP rejected this application due to the limited amounts of AAUs in the National JI Reserve—<b>considering that large projects, like Cogealac project had also requested the JI status.</b></p>	
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### **Clarification Request 34**

Please explain in summary the conditions on getting loans for project finance from various existing funds (EU funds, Romanian Natural Fund). Please indicate those wind power projects financed by these funds.

B.2.14.

The funding situation is highly variable from year to year. Here we provide an overview of funds available as of 2010. Among the EU Structural Funds, the most important is the Sectoral Program regarding Increasing Economic Competitiveness. This program holds a financing line dedicated to projects in the renewable energy field (line 4.2.1). Available funding was of about 420 million RON (roughly 100 million Euro), while the demand reached 8.3 billion RON (roughly 2 billion Euro), for 419 (< 10 MW) proposed projects ( <http://www.fonduri-structurale.ro/detaliu.aspx?t=Stiri&eID=6980> ).

Eligible conditions were:

- Public administration
- SME
- Large Enterprise
- Total project value: 0.4 mil RON – 50 mil Euro
- Maximum value financed per project: 80 mil RON
- Financed share; 40 – 70 % (larger amounts financed for SMEs)
- **Projects less than 10 MW**

The Environmental Fund opened a financing line for projects in the renewable energy field as well. The available funding was 440 million RON (about 100 mil Euro). For this second fund, both large enterprises and SMEs were eligible, but the amount accessible was limited to 30 million RON (about 7 million Euro) per project.

According to the submitted information, the EU originated Sectoral Programme initiatives by EU supports small size projects (<10 MW capacity).

The Environmental Fund supports small and large enterprises, but the finance amount is limited to 7 Million Euro.

The Cogealac 252.5 MW wind power project seems not eligible for making use of these funds.

The issue is closed.



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		<p>The share to be financed varied between 40% and 50%</p> <p>( <a href="http://www.fonduri-structurale.ro/detaliu.aspx?eID=5806&amp;t=altefinantari">http://www.fonduri-structurale.ro/detaliu.aspx?eID=5806&amp;t=altefinantari</a> ). The projects financed were all small size.</p> <p>The two mentioned funds are the main possibilities for investors in the renewable energy in Romania.</p> <p>Regarding the selection process and communication of the results, the process is hardly transparent, and as a result publicly available information is rather scarce. The situation is illustrated by the study prepared by the <b>NGOs Coalition for Structural Funds: “Emergency call for structural funds”</b> ( <a href="http://www.ce-re.ro/ENG/new/report-on-structural-fun">http://www.ce-re.ro/ENG/new/report-on-structural-fun</a> ).</p> <p>The same lack of transparent information applies to the National Environmental Fund: for instance, there are significant differences between the list of Fund-approved projects and the list of approved projects from Transelectrica. Indeed, it is not possible to state with certainty whether the Fund-approved projects are implemented or not, and which is their status.</p> <p>A list of wind projects approved for financing by the Environmental Fund in 2008 is attached (CR7_proiecte_acceptate_10_10-28_11_2008-anexa2). Also, a list of projects approved for EU funds financing is attached (CR8 _ ListaBeneficiariSelectati).</p>	
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<p><b><u>Clarification Request 35</u></b></p> <p>Please indicate in the Excel table (released by Transelectrica) those projects benefiting from EU funding and national funding.</p>	<p>B.2.14.</p>	<p>Please find attached the table «Wind parks with grid connection contracts_20100817», filled in as per the publicly available information. In addition, in order to better understand the situation of the transparency of funding in Romania, we attach a study prepared in 2009 by NGOs Coalition for Structural Funds: “Emergency call for structural funds”(<a href="http://www.ce-re.ro/ENG/new/report-on-structural-fun">http://www.ce-re.ro/ENG/new/report-on-structural-fun</a> ).</p> <p>Considering that for the EU Structural funds demand for project financing in the renewable energy field exceeded (in 2010) 20 times the available funding, it can be concluded that EU funding is not an easily available source of funding.</p> <p>Please also see CR7 above (several projects approved for financing are not in ANRE list and their status is unknown).</p>	<p>According to the publicly available information, there is no evidence on the finance of ANRE registered Wind power projects by the EU Funds. Considering the fact that the available EU funds would by far not meet the present finance demand and the large size Cogealac wind power project seems not eligible for the utilization of these funds.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
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<p><b>Clarification Request 36</b></p> <p>Please discuss the <b>Common Practice</b> according to the most recent information on wind power plants in Romania. The present operational licensed wind power plants have to be indicated precisely.</p>	<p>B.2.15.</p>	<p>The present operators, as per the most recent official information made available by ANRE, are presented in the attached “ RAPORT privind monitorizarea sistemului de promovare a E-SRE în anul 2009” (CR9_sreRapCV2009) produced by ANRE. The operational licensed wind power plants currently are:</p> <ul style="list-style-type: none"> <li>- S.C. ECOPROD ENERGY SRL (Topolog 1) (0.66 MW)</li> <li>- S.C. ILEXIMP SRL (Fântânele) (0.25 MW)</li> <li>- S.C. HOLROM Renewable Energy SRL (Baia) (2.65 MW))</li> <li>- S.C. ELECTROGRUP ENERGY SRL (Valea Nucarilor 2) (2.24 MW)</li> <li>- S.C. ELECTRO MARGO LINE SRL (Sânicoadă 2) (0.29 MW)</li> <li>- S.C. BLUE LINE ENERGY SRL (Sânicoadă 1) (0.29 MW)</li> <li>- S.C. ELECTRIC PROD S.A. (Măcin 1) (0.6 MW)</li> <li>- S.C. GREEN ENERGY GRUP S.A. (Dealul Nucarilor) (1.95 MW)</li> <li>- S.C. HYDRO-WIND POWER SRL (Valea Nucarilor 1) (1.35 MW)</li> <li>- S.C. E MARKET SRL (Tureni) (0.30 MW)</li> <li>- S.C. SERVOPLANT ECO ENERGY SRL (Corbu 1) (0.09 MW)</li> <li>- S.C. PIROTEHNIC OSB SRL (Muntanii de Jos) (0.25 MW)</li> <li>- S.C. TELESATELIT S.R.L. (CEE) (0.25 MW)</li> <li>- S.C. TOPLET ENERGY S.R.L. (Topleț 1) (1.8 MW)</li> <li>- S.C. ENERGYCUM W S.R.L. (Ruginești) (1.2 MW)</li> </ul>	<p>According to the publicly available information, the operational wind power plant capacity in Romania is 14 MW.</p> <p>Based on the publicly available information , similar wind power project activities:</p> <ul style="list-style-type: none"> <li>- Fantanele Vest 255 MW</li> <li>- Fantanele Est 90 MW</li> <li>- Casimcea 210 MW</li> </ul> <p>are under construction or not operational and at present the wind power generation at the Romanian Grid is not common practice (per definition in Additionality Tool).</p> <p>The issue is closed.</p> <p style="text-align: right;"><input checked="" type="checkbox"/></p>
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<p><b><u>Clarification Request 37</u></b></p> <p>Please provide more information on the implementation of other wind power projects considering the <b>investment barriers</b>.</p>		<p>The “investment barriers” discussed in the Cogealac PDD refer to wind projects of similar size to Cogealac. As per the Table above, all the wind parks operational as of 2009 were of far smaller dimensions and were therefore more easily funded through private and public sources, i.e., they did not face the same investment barriers as faced by Cogealac. We furthermore note that—although official data provided in CR9 only cover the situation up to the end of 2009—<b>no wind parks of the size of Cogealac are operational to date.</b></p>	<p>According to the information given by the project participant, at present no wind power plants of the same size are operational and connected to the grid.</p> <p>Please refer to <b>CAR5</b>.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Corrective Action Request 1.</u></b></p> <p>Please insert a table in the PDD, section A.2, indicating important milestones of the project activity. Evidence on the relevant dates has to be submitted.</p>	<p>A.1.4.</p>	<p>Table inserted as requested (pg. 21)</p> <p>See supporting documents PI_01 to PI_08</p>	<p>A timetable has been integrated in section B2, JI-PDD.</p> <p><b>Please refer to CAR4 for further process.</b></p>
<p><b><u>Corrective Action Request 2.</u></b></p> <p>More technical details about WTG units shall be included into the PDD.</p>	<p>A.4.2.1.</p>	<p>Details on WTG includes as requested (pg. 8-9)</p>	<p>Detailed technical information on the Wind-Turbine-Generators have been provided in section A.4.2., JI PDD v 03: It is GE 2.5x1, 100 m hub height, 99 m rotor diameter.</p> <p>The issue is resolved.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

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<p><b><u>Corrective Action Request 3.</u></b></p> <p>Please revise the <b>Barrier analysis</b> sub-step 3a accordingly:</p> <p>a. Investment Barriers: Please submit the Due Diligence report before OVIDIU acquisition.</p> <p>b. Technological Barriers : Please discuss the issue linked with other existing wind power plants.</p> <p>c. Barriers due to prevailing practice : The project activity is not first of its kind, please discuss.</p> <p>d. Other barriers : Please discuss, how other project activities have overcome these barriers.</p>	<p>B.2.12</p>	<p>a. We include the CONFIDENTIAL due diligence report by CUBE engineering. As discussed more at length in the PDD (see timetables and its supporting documents), it is clear that early report, delivered in May 2008, confirmed the poor financial attractiveness of Cogealac, highlighting at the same time several existing technical barriers as discussed in the PDD. In fact, the signed statements by the chief acquisition officer at CEZ, provided within our responses to CAR1 above, document that the initial consideration of JI was made right after results of due diligence report.</p> <p>b. It's in the PDD. Specifically, the PDD discusses issues linked with existing wind parks, specifying differences in capacity and size.</p> <p>c. d. see response to CL17-18-19-20. Furthermore we have inserted additional language in the PDD under common practice, that details the status of all existing wind parks, and includes a discussion of a large park (255MW), currently under construction.</p> <p>see B.2.12. We also have added language within the technical barriers and common practice analysis, arguing that --given that no similar size wind park is currently operational in Romania-- uncertainties about technical and operational risk are applicable to Cogealac but not to the existing wind parks.</p>	<p>a. The Due Diligence report has been submitted. It includes technical and financial feasibility of the Cogealac Wind Power project in its early stage.</p> <p>The statements concerning the wind power plants in the project boundary is not correct, as discussed above (<b>see CR 32-CR 37</b>) : The Cogealac Wind Power plant project is not first of its kind in the region. Other wind power projects, i.e. The Fan-tanele Vest Wind Power plant could be first of its kind, because it is ready to operate and has a capacity of 255 MW.</p> <p>b. Technological barriers</p> <p>The present status on wind power plants within the project boundary has not been considered: The present licensed wind power capacity is about 2263 MW and no information on this fact is provided.</p>
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			<p>c. Barriers due to prevailing practice Please refer to previous <b>CR 32-CR 37</b>.</p> <p>d. – Other barriers</p> <p>General investment risks (inflation, exchange rate), strategic risks (govt.), operation risks (electricity price, economic down size) have been discussed. These barriers are valid for other wind power plant investors as well.</p> <p><b>See CAR 5 for further process.</b></p>
<p><b><u>Corrective Action Request 4.</u></b></p> <p>Please revise the time table:</p> <ul style="list-style-type: none"> <li>- Date of first license issuance for Wind Partners</li> <li>- Date of license revision for 252.5 MW</li> <li>- Date of Wind-Turbine-Generator Supply Contract</li> <li>- Date of ODA declaration</li> </ul>		<p>PDD has been revised to include:</p> <p>25.07.2007 (urbanism certificate for Ovidiu Development)</p> <p>29.10.2009</p> <p>04.09.2009</p> <p>24.05.2010</p>	<p>The time line in section B.2., PDD has been updated accordingly.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

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<p><b><u>Corrective Action Request 5.</u></b></p> <p>Please revise the Barrier Analysis according to the most updated available information on other wind power projects within the project boundary.</p> <p>Information regarding the status of the Fantanele WPP has to be integrated in to the PDD.</p> <p>Please refer to <b>CAR 8/ CAR 9.</b></p>	<p>B.2.12</p>	<p>As the additional evidence provided above shows (CRs 7, 8, 9), the Barrier Analysis in the PDD is in line with updated publicly available information on all operational wind power projects in Romania.</p>	<p>a. Investment Barriers</p> <p>A project summary (dated 28-05-2008) based on available commercial and technical background information has been completed by the company CUBE. Due to limited information on wind, site conditions legal issues and the finances, CUBE rated the project activity in a development stage (<b>See CAR3 for further process</b>). The CUBE report made the project participant consider the JI, as summarized in Table, section B.2., PDD.</p> <p>It must be stated however, that the Fantanele wind power projects were implemented without JI, grants or other non-commercial finance terms, despite of the worldwide deteriorating finance conditions seen since 2008 and the current excess energy supply in Romania.</p>
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			<p>b. Technological barriers The wind power technology of the size of Cogealac and other wind power projects (Fantanele, Casimcea, others) is new in the Romanian grid, the issue of skilled labor and the technical infrastructure (grid dynamics) are important for a reliable operation.</p> <p>c. Barriers due to prevailing practice. The Cogealac wind power project activity claims being the first-of-its-kind JI project regarding the size and capacity.</p> <p>Actually, the Fantanele wind power projects are “ first-of-its-kind” in the Romanian energy sector, others like Cogealac 252.5MW and Casimcea 210MW wind power projects come behind.</p>
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			<p>d. – Other barriers</p> <p>Other barriers (inflation, exchange rates, policy, economy, electricity demand) are discussed. However, other projects face the same barriers.</p> <p><b>Please refer to CAR 8/ CAR 9 for further process.</b></p>
<p><b><u>Corrective Action Request 6.</u></b></p> <p>Please provide a detailed Monitoring Plan.</p>	<p>Section D, PDD</p>	<p>Monitoring Plan has been updated in the revised PDD</p>	<p>The electricity meters for invoicing will be maintained (calibration, replacement) by OMEPA, an affiliate of the grid operator Transelectrica. OMEPA as the financial entity performs all accounting operations.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Corrective Action Request 7.</u></b></p> <p>Please adjust the date and version number of the updated PDD</p>	<p>Section A, PDD</p>	<p>PDD updated</p>	<p>The version number and issuance date of the PDD have been revised.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

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<p><b><u>Corrective Action Request 8.</u></b></p> <p>Please submit evidence on the JI application for Fantanele Wind Power Plant projects (255MW Vest and 90MW Est) and the process, which finally led to the decision by the DFP. Please submit evidences that it is still not operational.</p>		<p>The owner of Fantanele Wind Farm Project, SC Tomis Team SRL, prepared the first version of the PIN for JI in the last quarter of 2008. The PIN considered Fantanele Vest and Fantanele Est as one joint project, totaling 347.5 MW.</p> <p>In July 2009, the PIN was submitted to the DFP for analysis in the NCCC. It was analysed in the meeting of August 2009 and the NCCC considered that the JI reserve (as per the National Allocation Plan) would not allow the DFP to grant the ERUs for projects already approved, if Fantanele had also been approved.(i.e. a very conservative estimate of ERUs for Fantanele would be 1.3 M by the end of 2012—about 24% of the NAP JI reserve). Please see attached evidence: Fantanele PIN, Letter for Submitting the PIN + receipt from the courier</p> <p>The Fantanele project is not yet operational and facing increasing financial problems. Information from CEZ indicates that only 15% of turbines are fully operational and export power to the grid; another 70% is still in test mode; while the remainder is not yet connected. Indeed, the expected operational date for Fantanele has been moved several times, from March 2010 (as per PIN) and mid-2010 (<a href="http://www.finmedia.ro/conferences/conferintele/energy_forum/ed1/presentation.php">http://www.finmedia.ro/conferences/conferintele/energy_forum/ed1/presentation.php</a> _ Adrian Borotea) to the currently expected date of Oct 2011.</p>	<p>Based on the submitted documents :</p> <ul style="list-style-type: none"> <li>- PIN on Fantanele 347.5 MW Wind PP dated 16.12.2008</li> <li>- Application on 20.07.2009 to DFP Romania for registering as track 1 project</li> <li>- Rejection of the request by the DFP due to the substantial ERU demand by Fantanele WPP and fixed reserves for other JI projects</li> </ul> <p>It can be stated, that the PP of Fantanele Wind PP has undertaken necessary steps for JI consideration and its exclusion was due to the limited ERU reserves of the NAP.</p> <p>At the time of Fantanele WPP application at the DFP, the Cogealac Wind Power Plant project had already acquired the JI status :</p>
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			<p>- JI application for Cogealac Wind Power Plant project on 02.03.2009 and issuance of LoE on 26.06.2009 (section B2., table of chronology, PDD).</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Corrective Action Request 9.</u></b></p> <p>a. Investment Barriers:</p> <p>Please provide evidence on the specific finance terms, which made the project participant look for other financial sources, i.e. JI, while at the same time the Fantanele wind power project is under construction.</p> <p>c. Barriers due to prevailing practice :</p> <p>The Cogealac wind power project activity is not “first-of-its-kind”. Please clarify in this context the status of Casimcea 210 MW wind power project, which also applied for JI.</p> <p>d. Other barriers :</p> <p>Please discuss, how other project activities</p>		<ul style="list-style-type: none"> <li>The PDD already explained that the financial situation was different for Cogealac, compared to Fantanele. Reasons were related largely to i) different risk outlooks and ii) different global and national financial environments. Indeed, in 2009 CEZ could secure for Fantanele a favorable loan from a group of German banks and companies, including financing of an export credit for equipment purchases of 262 mil Euro with a maturity of 15 years (<a href="http://www.cez.ro/index.php?id=2&amp;b=96&amp;l=1">http://www.cez.ro/index.php?id=2&amp;b=96&amp;l=1</a>); also, in the last quarter of 2009, the European Investment Bank approved a 200 mil Euro to CEZ for Fantanele (<a href="http://www.eib.org/projects/pipeline/2007/20070524.htm">http://www.eib.org/projects/pipeline/2007/20070524.htm</a> ). However funding from EIB, although approved on 10/2009, has not yet been finalized. This, and the operational delays mentioned above (CAR8), are con-</li> </ul>	<p>Based on the provided information on Fantanele WPP :</p> <p>a. Investment Barriers</p> <p>- The PP of Fantanele Wind Power Plant project has proven the JI consideration (See CAR8 regarding the JI application process for Fantanele Wind Power Plant project)</p> <p>- According to the confirmation of CEZ Trade Department, currently most of the Fantanele Wind Power Plant units are in testing mode and only 14 % is fully permitted / commissioned.</p> <p>- The delay in full operation</p>

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<p>have overcome these barriers.</p>		<p>tinuing to erode the financial security of Fantanele; indeed, so much so that CEZ is considering applying for JI funding also for Fantanele—as per confidential communications we had with CEZ management.</p> <ul style="list-style-type: none"> <li>The fact that another large wind power project such as Casimcea applied for JI confirms the analysis we provided in our PDD, confirming the existence of serious barriers to implementation without the additional funding in the form of JI ERUs.</li> </ul> <p>Casimcea PDD includes a "first-of-its-kind" type of barrier. In our opinion, if "first of its kind" is to be assessed by comparison with operational projects, then both Cogealac and Casimcea can claim "first" status at this moment, given that i) no similar project is currently operational (especially in terms of size and impact on the Grid); and ii) those that could become operational earlier--such as Fantanele--are showing significant delay in implementation.</p> <ul style="list-style-type: none"> <li>We note that there is no other project of this size online at the present moment. Fantanele project is not fully operational, more than six months after its intended target commissioning date. Tomis Team, which owns Fantanele, has only obtained to date</li> </ul>	<p>affects the projected cash flow.</p> <ul style="list-style-type: none"> <li>The co-financing of the Fantanele WPP project by European Investment Bank (EIB) is not completed yet</li> <li>The loans were granted to the mother company CEZ due to his reputation and credibility.</li> <li>The current global economic / finance conditions are highly unfavourable compared to 2009.</li> </ul> <p>It can be stated that the PP of Fantanele has taken efforts for the utilization of the JI revenues. The PP faces difficulties in project finance, even the loan conditions at that time were favourable.</p> <p>The financing conditions have worsened due to the worldwide economic crisis, i.e. loans for Cogealac Wind Power project activity are expected to be less favourable than that of Fantanele.</p> <p>c. and d. : Barriers due to</p>
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		<p>(end October 2010) a producer licence for about 50 MW out of the total 345 MW. Thus no activity similar in size and scope to Cogealac has yet fully overcome these barriers.</p>	<p>Prevailing Practice and Other Barriers</p> <p>Considering the special conditions of Fantanele WPP (see b.) and the fact that currently no other project of the size of Cogealac is operational, it can be stated that Cogealac Wind Power project with its size of 252.5 MW will be one of the first-of-its-kind JI projects in the public grid.</p> <p>Other wind power project activities with the similar high capacity (Casimcea 210 MW, 204 MW Pestera Wind Power project activities ) have applied for JI status and have got LoE by the DFP as well.</p> <p>The issue is closed.</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b><u>Forward Action Request No. 1.</u></b></p> <p>The updated Electricity Generation License by ANRE - not applicable at this moment – of the implemented project activity should be submitted during the initial and first periodic verification. The PDD and relevant documents have to be adjusted accordingly and</p>	<p>A.1.1.</p>		<p>Will be checked during first initial verification.</p>



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presented as well.			
<b><u>Forward Action Request No. 2.</u></b> Relevant certificates on Training & Qualification of the staff in charge for HV operation and WTG operation & maintenance should be presented during the initial and first periodic verification.	see <b>CR5</b> , Table 2		Will be checked during first initial verification.

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**Table 3 Unresolved Corrective Action and Clarification Requests (in case of denials)**

Clarifications and / or corrective action requests by determination team	Id. of CAR/CR	Explanation of Conclusion for Denial
-	-	-

Determination of the JI Track 1 Project:  
*Cogevalac Wind Power Project*




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## **Annex 2: Information Reference List**

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Ref. No.	Author/Editor/ Issuer	Title/Type of Document. Publication place	Issuance and/or submission date(dd/mm/yyyy)	Additional Information (Relevance in JI Context)
	TÜV SÜD	Onsite interview (07.04.2010 - 09.04.2010) carried out by TÜV SÜD: Determination Team: «Team_member» – GHG Auditor «Team_member2» – GHG Trainee «Team_member3» – GHG Trainee  Interviewed Persons: <i>Ondrei Safar</i> – CEZ Adrian Tita – CEZ Eva Polanska - CEZ Francesco Tubiello – GET Carbon Liviu Gheorghe – GET Carbon Valentina Stupar – CEZ Romania		
0.	SC OVIDIU DEVELOPMENT	PDD Wind Power Project – Version 5	15/11/2010	
1.	Ministry of the Environment	LoE for the Cogealac Wind Power Project	26/06/2009	LoE
2.	National website	<a href="http://www.mmediu.ro/protectia_mediului/schimbari_climatice.htm">http://www.mmediu.ro/protectia_mediului/schimbari_climatice.htm</a> Romanian DFP PDD form	26/11/2010	
3.	UNFCCC Website	ACM 0002, “Consolidated baseline methodology for grid-connected electricity generation from renewable sources”, Version 10.	26/11/2010	

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Ref. No.	Author/Editor/ Issuer	Title/Type of Document. Publication place	Issuance and/or submission date(dd/mm/yyyy)	Additional Information (Relevance in JI Context)
4.	CEZ WIND	Report on Local Stakeholder Meeting	16/09/2008	
5.	Primaria Comuna Cogealac	Environmental Impact Assessment Decision/ Environmental Agreement	24/07/2008	
6.	Primaria Comuna Cogealac	Public Announce for Environmental Impact Assessment	18/01/2008	
7.	Primaria Comuna Cogealac	Supporting documents regarding the public consultation for Environmental Impact Assessment	23/04/2008	
8.	CNTEE Transelectrica	Contract for connecting to the to transport electricity	14/04/2008	
9.	CN Transelectrica	Technical approval of connection for 255 MW	03/09/2007	
10.	CN Transelectrica	Technical approval of connection for 90 MW	03/09/2007	
11.	CN Transelectrica	Technical approval of connection for 255 MW	03/09/2007	
12.	Ovidiu Development	Environmental Impact Assessment Summary	07/04/2010	
13.	CUBE Engineering GmbH	Project Summary Ovidiu Wind Farm	28/05/2008	
14.	Autoritatea Nationala de Reglementare in Domeniu Energiei	Permit establishment to achieve new energy capacity "Wind Power Station Cogealac"	02/07/2009	
15.	Autoritatea Nationala de Reglementare in	Decision for Permit establishment to achieve new energy capacity "Wind Power Station Cogealac"	02/07/2009	

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		Information Reference List		

Ref. No.	Author/Editor/ Issuer	Title/Type of Document. Publication place	Issuance and/or submission date(dd/mm/yyyy)	Additional Information (Relevance in JI Context)
	Domeniu Energiei			
16.	Autoritatea Nationala de Reglementare in Domeniu Energiei	Decision for modifying the Permit establishment to achieve new energy capacity "Wind Power Station Cogealac"	29/10/2009	
17.	Oficiul Registrului Comertului de pe langa Tribunalul Bucuresti	Certificate Ovidiu Development	26/03/2010	
18.	Ovidiu Development	Table of Land Lease Agreements	08/04/2010	
19.	Ovidiu Development	Land Lease Agreement no 47	24/07/2010	
20.	Ovidiu Development	Request for the issuance construction authorization	22/07/2010	
21.	Ovidiu Development	Contract for Foundation and Roads	08/12/2009	
22.	Energobit	Single Line Diagram – Electrical network scheme of 33 kV – Station 1	08/04/2010	
23.	Energobit	Single Line Diagram – Electrical network scheme of 33 kV – Station 2	08/04/2010	
24.	Energobit	Single Line Diagram – Electrical network scheme of 33 kV – Station 3	08/04/2010	
25.	Energobit	Single wire electric scheme 110kV – Station 1	08/04/2010	
26.	Energobit	Single wire electric scheme 110kV – Stations 2,3	08/04/2010	


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27.	Energobit	Single wire electric scheme 33kV – Station 1	08/04/2010	
28.	Energobit	Single wire electric scheme 33kV – Stations 2,3	08/04/2010	
29.	Energobit	Basic diagram networks- 110kV Cogealac Parc	08/04/2010	
30.	MONSSON ALMA	Detailed Map for Wind Turbine Generators position	19/06/2009	
31.	GE Energy	Supply Agreement for Wind Turbine Generators	04/09/2009	
32.	GE Energy	Contract for Service and Maintenance	04/09/2009	
33.	GE Energy	Technical Documentation for Wind Turbine Generator System	08/04/2010	
34.	Ovidiu Development	Declaration of Non-Use of Official Development Assistant by Project Owner	24/05/2010	
35.	Ovidiu Development	Project Idea Note	02/03/2009	PIN
36.	Ovidiu Development	Agreement to Cooperate between Ovidiu Development and GET Carbon	20/07/2009	
37.	CEZ	Letter of Intent - Emission Reduction Arising from Wind Project in Romania	08/04/2010	LoI
38.	Autoritatea Nationala de Reglementare in Domeniu Energiei	Rules for qualification priority production of electricity from renewable energy sources	30/06/2010	
39.	Autoritatea Nationala de Reglementare in	Order on approval of the priority rating of electricity production from renewable energy sources	30/06/2010	


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	Domeniu Energiei			
40.	Consiliul Judetaen Constanta	Urbanism Certificate	25/07/2007	
41.	Ovidiu Development	Scada Cogealac	30/06/2010	
42.	Colterm SA	Baseline study - NEW 20 MW COGENERATION EQUIPMENT IN CET TIMISOARA CENTRU	30/06/2010	
43.	Tomis Team	Power Evacuation Agreement	21/05/2010	
44.	Autoritatea Nationala de Reglementare in Domeniu Energiei	Raport 2009	30/06/2010	
45.	Wolf Theiss	The Wolf Theiss Guide to Generating Electricity from Renewable Sources in Central, Eastern & Southeastern Europe	30/06/2010	
46.	BBB Umwelttechnik GmbH	Wind Assesement Cogealac	30/06/2010	
47.	Ovidiu Development	General Meeting of the Shareholders of Ovidiu Development	30/06/2010	
48.	Ovidiu Development	Presentation Organization and Maintainance Cogealac	30/06/2010	
49.	Ministry of Environment	List of LoE and LoA for the 2005-2010 Period	30/06/2010	



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Ref. No.	Author/Editor/ Issuer	Title/Type of Document. Publication place	Issuance and/or submission date(dd/mm/yyyy)	Additional Information (Relevance in JI Context)
50.	Ovidiu Development	Wind Park with grid connection contracts_20100817	03/06/2010	
51.	Ovidiu Development	Wind Park with grid connection contracts	05/04/2010	
52.	Centru de Resurse pentru Participare Publica	Report for "Emergency Call for Structural Funds",	30/06/2010	
53.	Administratia Fondului pentru Mediu	List of projects approved by the National Environmental Fund	30/06/2010	
54.	Administratia Fondului pentru Mediu	List of beneficiaries of grant under the Sectoral Operational Programme "Increasing Economic Competitiveness"; Priority Axis 4 "Increasing energy efficiency and security of supply, in context of combat climate change" Version from June 2010	30/06/2010	
55.	Administratia Fondului pentru Mediu	List of beneficiaries of grant under the Sectoral Operational Programme "Increasing Economic Competitiveness"; Priority Axis 4 "Increasing energy efficiency and security of supply, in context of combat climate change"	30/06/2010	
56.	Autoritatea Nationala de Reglementare in Domeniu Energiei	Report regarding the monitoring system of promoting renewable energy in 2009	30/06/2010	
57.	Guvernul Romaniei	Licensing Regulation – Rule for According the License and authorizations in electrical energy sector	07/05/2010	

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Ref. No.	Author/Editor/ Issuer	Title/Type of Document. Publication place	Issuance and/or submission date(dd/mm/yyyy)	Additional Information (Relevance in JI Context)
58.	Guvernul Romaniei	Government Decision regarding the promotion system of electricity production from RES	30/06/2010	
59.	Autoritatea Nationala de Reglementare in Domeniu Energiei	Guidelines for the producer of electricity from renewable energy sources	30/06/2010	
60.	SC OVIDIU DEVELOPMENT	PDD Wind Power Project – Version 6	22/12/2010	
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63.	JISC	JOINT IMPLEMENTATION DETERMINATION AND VERIFICATION MANUAL	12/2009	Joint Implementation Supervisory Committee Nineteenth meeting Report - Annex 4
64.	SC OVIDIU DEVELOPMENT	PDD Wind Power Project – Version 8	11/01/2011	Final PDD