



# VALIDATION REPORT

## VIETNAM CARBON ASSETS LTD

### VALIDATION OF THE SONG BUNG 6 HYDROPOWER PROJECT

REPORT No. VIETNAM-VAL/0010/2011

REVISION No. 02

BUREAU VERITAS CERTIFICATION

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Client: Vietnam Carbon Assets Ltd	Client ref.: Renat Heuberger
<p>Summary: Bureau Veritas Certification has made the validation of the Song Bung 6 hydropower project of Song Bung Joint Stock Company (SBJSC) located in Ma Cooih and Ka Dang Communes, Dong Giang District and Thanh My Town, Nam Giang District, Quang Nam Province, Vietnam on the basis of UNFCCC criteria for the CDM, as well as criteria given to provide for consistent project operations, monitoring and reporting. UNFCCC criteria refer to Article 12 of the Kyoto Protocol, the CDM rules and modalities and the subsequent decisions by the CDM Executive Board, as well as the host country criteria.</p> <p>The validation scope is defined as an independent and objective review of the project design document, the project's baseline study, monitoring plan and other relevant documents, and consisted of the following three phases: i) desk review of the project design and the baseline and monitoring plan; ii) follow-up interviews with project stakeholders; iii) resolution of outstanding issues and the issuance of the final validation report and opinion. The overall validation, from Contract Review to Validation Report &amp; Opinion, was conducted using Bureau Veritas Certification internal procedures.</p> <p>The first output of the validation process is a list of Clarification and Corrective Actions Requests (CL and CAR), presented in Appendix A. Taking into account this output, the project proponent revised its project design document.</p> <p>In summary, it is Bureau Veritas Certification's opinion that the project correctly applies the baseline and monitoring methodology ACM0002, version 12.2.0 and meets the relevant UNFCCC requirements for the CDM and the relevant host country criteria.</p>	

Report No.: VIETNAM-val/0010/2011	Subject Group: CDM
Project title:  Song Bung 6 Hydropower Project	
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**Indexing terms**

Work approved by:

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### Abbreviations change / add to the list as necessary

BVC	Bureau Veritas Certification
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CER	Certified Emission Reductions
CL	Clarification Request
CO <sub>2</sub>	Carbon Dioxide
DNA	Designated National Entity
DOE	Designated Operational Entity
DR	Document Review
EIA	Environmental Impact Assessment
ERPA	Emission Reductions Purchasing Agreement
EVN	Electricity Vietnam Group
FSR	Feasibility Study Report
GHG	Green House Gas(es)
I	Interview
IETA	International Emissions Trading Association
IRR	Internal Rate of Return
LLR	Local Lending Rate
LoA	Letter of Approval
MoV	Means of Verification
MP	Monitoring Plan
NGO	Non Government Organization
ODA	Official Development Assistance
PCF	Prototype Carbon Fund
PDD	Project Design Document
PP	Project Proponent (Project owner)
PPA	Power Purchase Agreement
PPC	People Provincial Committee
RI	Report Issuance
SBJSC	Song Bung Joint Stock Company
SV	Site visit
UNFCCC	United Nations Framework Convention for Climate Change
VND	Vietnamese Dong (Vietnamese Currency)
VNEEC	Energy and Environment Consultancy Joint Stock Company
VNEG	Vietnamese National Electricity Grid
VVM	Validation and Verification Manual



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## **1 INTRODUCTION**

Vietnam Carbon Assets Ltd has commissioned Bureau Veritas Certification to validate its CDM project Song Bung 6 Hydropower Project (hereafter called “the Project”) of Song Bung Joint Stock Company (SBJSC) at Ma Cooih and Ka Dang Communes, Dong Giang District and Thanh My Town, Nam Giang District, Quang Nam Province, Vietnam

This report summarizes the findings of the validation of the project, performed on the basis of UNFCCC criteria, as well as criteria given to provide for consistent project operations, monitoring and reporting.

### **1.1 Objective**

The validation serves as project design verification and is a requirement of all projects. The validation is an independent third party assessment of the project design. In particular, the project's baseline, the monitoring plan (MP), and the project's compliance with relevant UNFCCC and host country criteria are validated in order to confirm that the project design, as documented, is sound and reasonable, and meet the stated requirements and identified criteria. Validation is a requirement for all CDM projects and is seen as necessary to provide assurance to stakeholders of the quality of the project and its intended generation of certified emission reductions (CERs).

UNFCCC criteria refer to Article 12 of the Kyoto Protocol, the CDM rules and modalities and the subsequent decisions by the CDM Executive Board, as well as the host country criteria.

### **1.2 Scope**

The validation scope is defined as an independent and objective review of the project design document, the project's baseline study and monitoring plan and other relevant documents. The information in these documents is reviewed against Kyoto Protocol requirements, UNFCCC rules and associated interpretations.

The validation is not meant to provide any consulting towards the Client. However, stated requests for clarifications and/or corrective actions may provide input for improvement of the project design.

### **1.3 Validation team**

The validation team consists of the following personnel:



FUNCTION	NAME	CODE HOLDER*	TASK PERFORMED
<b>Lead Verifier</b>	Tran Viet Hoang	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> DR <input checked="" type="checkbox"/> SV <input checked="" type="checkbox"/> RI
<b>Verifier</b>	Nguyen Hong Linh	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> DR <input type="checkbox"/> SV <input checked="" type="checkbox"/> RI
<b>Technical Specialist</b>	NA	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> DR <input type="checkbox"/> SV <input type="checkbox"/> RI
<b>Financial Specialist</b>	Nguyen Huy Vu	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> DR <input type="checkbox"/> SV <input checked="" type="checkbox"/> RI
<b>Financial Specialist</b>	Sushil Budhia	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> DR <input type="checkbox"/> SV <input checked="" type="checkbox"/> RI
<b>Internal Technical Reviewer (ITR)</b>	Ashok Mammen	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> DR <input type="checkbox"/> SV <input checked="" type="checkbox"/> RI
<b>Specialist supporting ITR</b>		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> DR <input type="checkbox"/> SV <input type="checkbox"/> RI

\*DR = Document Review; SV = Site Visit; RI = Report issuance

## 2 METHODOLOGY

The overall validation, from Contract Review to Validation Report & Opinion, was conducted using Bureau Veritas Certification internal procedures.

In order to ensure transparency, a validation protocol was customized for the project, according to the version 01.2 of the Clean Development Mechanism Validation and Verification Manual, issued by the Executive Board at its 55<sup>th</sup> meeting on 30/07/2010. The protocol shows, in a transparent manner, criteria (requirements), means of validation and the results from validating the identified criteria. The validation protocol serves the following purposes:

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

The completed validation protocol is enclosed in Appendix A to this report.

**Figure 1: Validation Protocol Tables**

<b>Validation Protocol Table 1: Requirement Checklist</b>			
<b>Checklist questions</b>	<b>Reference</b>	<b>Comment</b>	<b>Draft and/or Final Conclusion</b>
The various requirements in Table 1 are linked to checklist questions the project would meet. The checklist is organized in several sections. Each section is then further sub – divided. The lowest level constitutes a checklist questions.	Gives reference documents where the answer to the checklist question or item is found.	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.	This is either acceptable based on evidence provided (OK), or a Corrective Action Request (CAR) due to non – compliance with the checklist question (See below). Clarification Request (CL) is used when the validation team has identified a need for further clarification
<b>Validation Protocol Table 2: Resolution of Corrective Action and Clarification Request</b>			
<b>Report Clarification and Corrective Action Requests</b>	<b>Ref. to checklist questions in tables 1</b>	<b>Summary of project owner response</b>	<b>Validation Conclusion</b>
If the conclusions from the Validation are either a Corrective Action Request or Clarification Request, these should be listed in this section	Reference to the checklist question number in Table 1 where the Corrective Action Request or Clarification Request is explained.	The responses given by the Client or other project participants during the communications with the validation team should be summarized in this section	This section should summarize the validation team's responses and final conclusions. The conclusions should also be included in Table 1, under "Final Conclusion"

## 2.1 Review of Documents

The Project Design Document (PDD) /Ref-1/ submitted by VNEEC and additional background documents related to the project design and baseline, i.e. country Law, Guidelines for Completing the Project Design Document (CDM-PDD), Approved methodology, Kyoto Protocol, Clarifications on Validation Requirements to be Checked by a Designated Operational Entity were reviewed.





To address Bureau Veritas Certification corrective action and clarification requests VNEEC revised the PDD and resubmitted it on 03<sup>rd</sup> Oct 2011

The validation findings presented in this report relate to the project as described in the PDD version 2.3 /Ref-2/.

## 2.2 Follow-up Interviews

On 27/05/2011, Bureau Veritas Certification performed interviews with project stakeholders to confirm selected information and to resolve issues identified in the document review. Representatives of Song Bung Joint Stock Company (SBJSC) were interviewed (see section **6 – References**). The main topics of the interviews are summarized in Table 1.

**Table 1 Interview topics**

Interviewed organization	Interview topics
Song Bung Joint Stock Company (SBJSC) (Project Owner)	<ul style="list-style-type: none"> <li>➤ Project background and CDM consideration</li> <li>➤ Project technology, operation, maintenance and monitoring capability</li> <li>➤ Project monitoring and management plan</li> <li>➤ Stakeholder consultation process</li> <li>➤ Project approval status (EIA, FSR, ...)</li> <li>➤ Hydro electric power development in Quang Nam Province</li> <li>➤ Government policies related to hydro electric power projects development</li> </ul>
Local Stakeholder (Representative of People Committee, local people affected by Project)	<ul style="list-style-type: none"> <li>➤ Project background in details</li> <li>➤ Stakeholder comments on project development</li> <li>➤ Social and environment impact of the project</li> </ul>
VNEEC (Project Participant)	<ul style="list-style-type: none"> <li>➤ Applicability of selected methodology</li> <li>➤ Baseline scenario identification</li> <li>➤ Emission reductions calculation</li> <li>➤ Emission reductions monitoring plan</li> <li>➤ Investment analysis for additionality of the project</li> </ul>

## 2.3 Resolution of Clarification and Corrective Action Requests

The objective of this phase of the validation is to raise the requests for corrective actions and clarification and any other outstanding issues that needed to be clarified for Bureau Veritas Certification positive conclusion on the project design.

Corrective Action Requests (CAR) is issued, where:

- (a) The project participants have made mistakes that will influence the ability of the project activity to achieve real, measurable additional emission reductions;
- (b) The CDM requirements have not been met;



(c) There is a risk that emission reductions cannot be monitored or calculated.

The validation team may also use the term Clarification Request (CL), if information is insufficient or not clear enough to determine whether the applicable CDM requirements have been met.

To guarantee the transparency of the verification process, the concerns raised are documented in more detail in the verification protocol in Appendix A.

## 2.4 Internal Technical Review

The validation report underwent an Internal Technical Review (ITR) before requesting registration of the project activity.

The ITR is an independent process performed to examine thoroughly that the process of validation has been carried out in conformance with the requirements of the validation scheme as well as internal Bureau Veritas Certification procedures.

The Lead Verifier provides a copy of the validation report to the reviewer, including any necessary validation documentation. The reviewer reviews the submitted documentation for conformance with the validation scheme. This will be a comprehensive review of all documentation generated during the validation process.

When performing an Internal Technical Review, the reviewer ensures that:

The validation activity has been performed by the team by exercising utmost diligence and complete adherence to the CDM rules and requirements.

The review encompasses all aspects related to the project which includes project design, baseline, additionality, monitoring plans and emission reduction calculations, internal quality assurance systems of the project participant as well as the project activity, review of the stakeholder comments and responses, closure of CARs, CLs and FARs during the validation exercise, review of sample documents.

The reviewer compiles clarification questions for the Lead Verifier and Validation Team and discusses these matters with Lead Verifier.

After the agreement of the responses on the 'Clarification Request' from the Lead Verifier as well as the PP(s) the finalized validation report is



accepted for further processing such as uploading on the UNFCCC webpage.

### 3 VALIDATION CONCLUSIONS

In the following sections, the conclusions of the validation are stated.

The findings from the desk review of the original project design documents and the findings from interviews during the follow up visit are described in the Validation Protocol in Appendix A.

The Clarification and Corrective Action Requests are stated, where applicable, in the following sections and are further documented in the Validation Protocol in Appendix A. The validation of the Project resulted in **23** Corrective Action Requests (CARs) and **07** Clarification Requests (CLs).

The CARs, CLs were closed based on adequate responses from the Project Participant(s) which meet the applicable requirements. They have been reassessed before their formal acceptance and closure.

The number between brackets at the end of each section correspond to the VVM paragraph

#### 3.1 Approval (49-50)

The letters of approval (LoAs) have been received and the following support documentation has been verified by Bureau Veritas Certification:

- The DNA of Vietnam has issued a Letter of Approval on 28<sup>th</sup> September 2011 (No: 50/2011/DMHCC-BCD), authorizing Song Bung Joint Stock Company (SBJSC) and Energy and Environment Consultancy Joint Stock Company (VNEEC) as the Project Participants and confirmed that the Project contributes to Vietnam's sustainable development /Ref-3/

- The Switzerland's DNA has issued a Letter of Approval on 23<sup>rd</sup> August 2011 (Reference: G514-3487), authorizing Vietnam Carbon Assets Ltd as the Project Participant for the Project /Ref-4/

The LoAs indicate that Vietnam and Switzerland are Parties of the Kyoto Protocol and moreover the participations in Song Bung 6 hydropower Project are voluntary.

The LoAs do not contain a specific version of the PDD and the validation report. The title and contents of the letters of approval refer to the precise



proposed CDM project activity title in the PDD being submitted for registration

Bureau Veritas Certification received these letters from the PPs and does not doubt the letters' authenticities

- Bureau Veritas Certification considers the letters of approval are in accordance with para. 45 – 48/VVM
- Complying with para.49 – 50/VVM, Bureau Veritas Certification recognizes that the Project is helpful to fulfil the host country's objectives of promoting sustainable development. The Project is expected to be in line with Vietnam's sustainable development because of:

❖ GHG emission reductions:

The Project will help reduce the Greenhouse gas emissions by reducing the electricity generation from the fossil-fuel fired power plants

❖ Employment opportunities

The conducting of the proposed project activity will create employment opportunities during the construction phase and operational period

❖ Economic improvement

For socio – economic well – being, the Project will construct new roads, improve existing roads as a part of Project's construction. During construction and operation of the Project, local people will be employed.

There are evidences in various approvals issued by the Local Government of Vietnam

- Feasibility Study Report (FSR) established by Consultant and Investment on Hydropower Construction Joint Stock Company on 15<sup>th</sup> Apr 2010 / Ref-5/
- Environmental Impact Assessment (EIA) established by Dat Phuong JSC and Consultant and Investment on Hydropower Construction JSC on 27<sup>th</sup> Feb 2009 /Ref-6/
- Approval of Environmental Impact Assessment Report, issued by Quang Nam People Committee, dated on 30<sup>th</sup> Mar 2009 /Ref-7/

In the absence of the Project, equivalent amount of annual power output of the Project will be generated and supplied by Electricity of Vietnam; this is the same with baseline scenario. The Project scenario is considered additional in comparison to the baseline scenario, and therefore eligible to receive Certified Emission Reductions (CERs) under the CDM, based on the analysis presented in the PDD.

The overall layout of the Project is sound, and the geographical and temporal (7 years) boundary of the Project is clearly defined



The validation did not reveal any information that indicates that the Project can be seen as a diversion of official development assistance (ODA) funding towards the host country

### 3.2 Participation (54)

The participation for each project participant has been approved by a Party of the Kyoto Protocol.

Complying with para.54/VVM, Bureau Veritas Certification concluded this by referring to the information on UNFCCC website

<http://maindb.unfccc.int/public/country.pl?country=VN> and

<http://maindb.unfccc.int/public/country.pl?country=CH>

### 3.3 Project design document (57)

Complying with para.57/VVM, Bureau Veritas Certification hereby confirms that the PDD complies with the latest Project Design Document Form (CDM – PDD) version 03 and guidance documents for completion of PDD, version 07 [1]

### 3.4 Changes in the Project Activity

During the site visit following changes were observed in project as compared to details mentioned in web hosted PDD:

1. The distance of transmission line was demonstrated in the PDD version 2.2
2. Technical specifications of turbines and generator:

Items	PDD v1.0 description	Actual conditions
cosφ of Generator	NA	0.95

3. Detail information of imported equipment was more sufficiently provided in the PDD version 2.2

4. Description of penstock was excluded in the PDD version 2.2, because no penstock will be built for the Project activity

Details of justifications are available in the Validation protocol



The final PDD version 2.3 has following changes as compared to PDD version 1.0 that was web hosted.

### 3.5 Project description (64)

The Project is located in Ma Cooih and Ka Dang Communes, Dong Giang District and Thanh My Town, Nam Giang District, Quang Nam Province, Vietnam.

The Project has coordinates as below:

Dam:	15 <sup>0</sup> 48'46"	Northern latitude
	107 <sup>0</sup> 45'43"	Eastern longitude

The total installed capacity of the Project is 29 MW with 02 turbines which are imported from China. The Project activity involves the construction of a dam, powerhouse, electricity distribution station and a reservoir with a power density of 72.9 W/m<sup>2</sup>. A discharge channel is also built to convert potential flowing energy from Bung River into clean electrical energy. Electricity generated from the Project will be supplied to the national grid through 110kV transmission line. At the connection point, the digital and bi – directional power meter systems will be installed to measure import and export electricity of the hydropower plant.

The process undertaken by Bureau Veritas Certification to validate the accuracy and completeness of the project description including the documentation check; cross – check with Feasibility Study Report /Ref-5/; EPC Contract /Ref-8/

Complying with para.64/VVM, Bureau Veritas Certification hereby confirms that the Project description in the PDD /Ref-2/ is accurate and complete in all respects and the final PDD version 2.3 has following changes as compared to PDD version 1.0 that was web hosted. Details of justifications are available in the Validation protocol

### 3.6 Baseline and monitoring methodology

#### 3.6.1 General requirement (76-77)

The project uses the approved consolidated baseline and monitoring methodology ACM0002, version 12.2.0 – “Consolidated baseline methodology for grid – connected electricity generation from renewable sources” dated on 25<sup>th</sup> November 2011 [2]

The assessment of the relevant information contained in the PDD against each applicability conditions is described below:

- The Project is a grid – connected renewable power generation project
- The Project is a new hydro electric power plant
- The Project is not a capacity addition, retrofit or replacement of an existing power plant



- The project activity results in a new reservoir and the power density of the power plant is greater than 4 W/m<sup>2</sup>.

Bureau Veritas Certification hereby confirms that the selected baseline and monitoring methodology, tool and other methodology component are previously approved by the CDM Executive Board, and is applicable to the project, which complies with all the applicability conditions therein.

By the mean of review the FSR of the Project, Bureau Veritas Certification found that the power density of this hydro electric power project is 72.9 W/m<sup>2</sup> (greater than 10 W/m<sup>2</sup>). Based on the on – site assessment, Bureau Veritas Certification hereby confirms that, as a result of the implementation of proposed CDM project activity, there are no GHG emissions occurring within the proposed project boundary, which are expected to contribute more than 1% of the overall expected average annual emissions reductions, which are not addressed by the applied methodology /Ref -5/

### 3.6.2 Project boundary (80)

The spatial extent of the Project boundary is clearly defined in line with the ACM0002, version 12.2.0 as the physical, geographical site of Project and all other power plants connected physically to the Vietnamese National Electricity Grid (VNEG).

Complying with para.57/VVM, Bureau Veritas Certification hereby confirms that the identification of the Project boundary and the sources and gases selected is in line with the delineation of grid boundaries as provided in the “Calculation emission factor of Vietnamese Electricity Grid issued by DNA of Vietnam, dated on 26<sup>th</sup> March 2010” /Ref-9/.

During on-site visit, by observing of physical site, based on the above assessment Bureau Veritas Certification hereby confirms that the identified boundary and the selected sources and gases are justified for the Project

### 3.6.3 Baseline identification (87-88)

The steps taken to assess the requirement given in paragraph 81 and 82 of the VVM are described below:

As the Project is the installation of a newly built and grid – connected renewable power plant that delivers the generated electricity to the grid, hence, according to methodology ACM0002, the baseline scenario is properly determined as:

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 a new generation sources, as reflected in the combined margin (CM), calculations described in the “Tool to calculate emission factor for an electricity system” version 2.2.1, EB 63<sup>rd</sup>, dated on 29<sup>th</sup> Sep 2011 [3]





Currently, in Vietnam, only EVN exclusively operates the national electricity grid which is the unique transmission and distribution line. All power plants in Vietnam are physically connected to the line, is project electricity system.

Therefore, baseline scenario of the proposed project is determined as the delivery of equivalent amount of annual power output from the Vietnam national grid which connected to the proposed project.

Complying with para.87 and 88/VVM, Bureau Veritas Certification hereby confirms that:

- a) All the assumptions and data used by the project participants are listed in the PDD, including their references and sources
- b) All documentation used and relevant for establishing the baseline scenario and correctly quoted and interpreted in the PDD
- c) Assumptions and data used in the identification of the baseline scenario are justified appropriately, supported by evidences and can be deemed reasonable
- d) Relevant national and/or sectoral policies and circumstances are considered and listed in the PDD
- e) The approved baseline methodology has been correctly applied to identify the most reasonable baseline scenario and the identified baseline scenario reasonably represents what would occur in the absence of the proposed project activity

### **3.6.4 Algorithms and/or formulae used to determine emission reductions (92-93)**

The steps taken to assess the requirement outlined in the paragraph 89 of the VVM are described below:

According to the baseline methodology ACM0002, version 12.2.0 [2] and “Tool to calculate emission factor for an electricity system” version 2.2.1 [3], the baseline emission factor was calculated as following 06 steps. In addition, the calculation in the PDD refer the latest “Calculation emission factor of Vietnamese Electricity Grid” /Ref-9/ published by Vietnam’s DNA on 26<sup>th</sup> March 2010 which is most recent information available at the time of CDM-PDD submission to Bureau Veritas Certification for validation

As per “Tool to calculate emission factor for an electricity system” version 2.2.1 [3], 06 steps herein are conducted to calculate the emission factor

#### **Step 1: Identify the relevant electricity systems**

VNEG was selected as the electric power system of the Project as per “Calculation emission factor of Vietnamese Electricity Grid” issued by Vietnam’s DNA at the time of start this validation. VNEG is the connected electricity system. Option B, Weighted Average Operation Margin is selected to calculate the emission factors for net electricity imports from VNEG.

- Bureau Veritas Certification is able to confirm that the identified electric power system of the Project is consistent with “Calculation emission factor of Vietnamese





Electricity Grid". The geographical extent of the Project activity system has been documented transparently and all grid power plants connected to the system have been identified

Step 2: Choose whether to include off – grid power plant in the project electricity system  
Option I (only grid power plants are included in the calculation) provided in "Calculation emission factor of Vietnamese Electricity Grid" is selected to calculate the operating margin and build margin emission factor

Step 3: Select a method to determine the operating margin (OM)

For calculation of the operating margin emission factor, the simple OM emission factor calculation method is selected because low-cost/must-run projects constitute less than 50% of the total grid generation during the last 5 years.

- Only grid power plants are included in the calculation. Bureau Veritas Certification has checked the calculation for low-cost/must-run constitution of the total grid generation and confirmed the calculation is correct. Therefore, simple OM emission factor calculation method is selected reasonably. A 5-year generation weighted average, based on the most recent data from "Report of Power plants in Vietnam power system" 2004 – 2008 according to CV4680/BCT-NL 2009 and CV 7533/BCT-NL, issued in July 2009 by Ministry of Industry and Trade, which are the data available at the time of submission of the CDM-PDD to the Bureau Veritas Certification for validation, has been applied and calculated correctly

Step 4: Calculate the operating margin emission factor according to selected method

Option B, based on data on the total net electricity generation of all power plants serving the system and fuel types and the total fuel consumption of the project electricity system, is used to calculate simple OM emission factor. The data on electricity generation and auxiliary electricity consumption are obtained from the "Report of Power plants in Vietnam power system" 2004 – 2008 according to CV4680/BCT-NL 2009 and CV 7533/BCT-NL, issued in July 2009 by Ministry of Industry and Trade. The data on different fuel consumption for power generation and the net caloric values of the fuels are obtained also from "Report of Power plants in Vietnam power system" 2004 – 2008. The renewable crediting period is adopted for the Project and the OM will be fixed for the first crediting period

- The data source are deemed reasonable and Bureau Veritas Certification confirms that the calculation can be replicated using the data and parameter provided in the PDD

Step 5: Calculate the build margin (BM) emission factor

The set of power capacity additions in the electricity system that comprise 20% of the system generation (in MWh) and that have been built more recently (option b) is adopted properly for the Project.

Considering data availability, deviation accepted by EB was used in the PDD i.e

1/ Use of capacity additions during the last 1 – 3 years for estimating the build margin emission factor for grid – connected electricity



2/ Use of weights estimated using installed capacity in place of annual electricity generation

- Bureau Veritas Certification hereby confirms that the data source and approaches taken are deemed reliable

The BM emission factor of the power grid is calculated by multiplying the emission factor of the thermal power with the share of the thermal power in the most recently added approach to 20% of total installed capacity. The emission factor for thermal power is determined based on the most advanced and commercially available technology endorsed by Vietnam's DNA

- Bureau Veritas Certification hereby confirms that the data sources are deemed reliable and calculation is appropriate

Step 6: Calculate the Combined margin (CM) emission factor:

According to "Tool to calculate emission factor for an electricity system" version 2.2.1 [3], the default weights  $w_{OM} = 0.5$  for Operating margin and  $w_{BM} = 0.5$  for Build margin in the first crediting period of hydropower projects are adopted.

As per baseline methodology ACM0002, version 12.2.0 [2] and "Tool to calculate emission factor for an electricity system" version 2.2.1 [3], the baseline emission sources considered are the emission reduction  $ER_y$  during the crediting period is the difference between baseline emissions, project emissions and leakage emissions. There are:

1/ Baseline emissions:  $BE_y$  (tCO<sub>2</sub>) are equal to baseline emission factor  $EF_{Grid,CM,y}$  (tCO<sub>2</sub>/MWh) times the net electricity supplied to the grid  $EG_y$  (MWh)

With the reference to "Tool to calculate emission factor for an electricity system" version 2.2.1 [3], the simple OM emission factor ( $EF_{Grid,OM,y}$ ) of VNEG is calculated as 0.6465 tCO<sub>2</sub>e/MWh. Similarly, the BM emission factor ( $EF_{Grid,BM,y}$ ) of VNEG is calculated as 0.5064 tCO<sub>2</sub>e/MWh.

Therefore the combined baseline emission factor is determined ex-ante will remain fixed during the first crediting period

$$EF_{Grid,CM,y} = 0.6465 \times 0.5 + 0.5064 \times 0.5 = 0.5764 \text{ tCO}_2\text{e/MWh}$$

The net electricity supplied to the grid in the FSR determined by the qualified party is 118,712 MWh per year

Therefore, the baseline emissions of the Project are:

$$BE_y = EF_{Grid,CM,y} \times EG_y = 118,712 \times 0.5764 = 68,425 \text{ tCO}_2\text{e}$$

2/ Project Emissions: the Project is a newly built hydro project with reservoir, the project emissions from water reservoirs are calculated as per ACM0002 version 12.2.0:

Firstly, determining the power density of the Project:

$$PD = Cap_{PJ} / A_{PJ}$$

Where:

PD : power density of the Project activity (W/m<sup>2</sup>)

Cap<sub>PJ</sub> : installed capacity of the hydropower plant (W)

A<sub>PJ</sub> : the area of the reservoir measured in the surface of the water, after the implementation of the project activity, when the reservoir is full (m<sup>2</sup>)



The installed capacity of the Project is 29 MW, and the area of the reservoir of the Project determined in the FSR is 0.398 km<sup>2</sup>, therefore the power density of the Project is:  $PD = (29 \times 10^6) \div (0.398 \times 10^6) = 72.9 \text{ W/m}^2$

Since the Power density is greater than 10 W/m<sup>2</sup>, the project emissions = 0  
 $PE_y = 0$

3/ Leakage emissions: no leakage has to be considered as per methodology.

4/ Emission reductions:

$$ER_y = BE_y - PE_y - LE_y = 68,425 \text{ tCO}_2\text{e}$$

The estimated annual emission reductions of the Project is 68,425 tCO<sub>2</sub>e during the first crediting period represents a reasonable estimation using the assumptions given by the Project

\*\* Complying with para 92 and 93/VVM, Bureau Veritas Certification hereby confirms that:

- a. All assumptions and data used by the project participants are listed in the PDD, including their references and sources;
- b. All documentation used by project participants as the basis for assumptions and source for data is correctly quoted and interpreted in the PDD
- c. All values used in the PDD are considered reasonably in the context of the proposed Project activity
- d. The baseline methodology ACM0002, version 12.2.0 and "Tool to calculate emission factor for an electricity system" version 2.2.1 has been applied correctly to calculate the baseline emissions, project emissions, leakage emissions and emission reductions
- e. All estimates of the baseline emissions can be replicated using the data and parameter values in the PDD

### 3.7 Additionality of a project activity (97)

The steps taken and sources of information used, to cross – check the information contained in the PDD on this matter is described below:

"Tool for Demonstration and Assessment of Additionality" version 06.0 dated on 25<sup>th</sup> Nov 2011 (here after called "Tool – Additionality") [4] has been employed for demonstrating and assessing the additionality of the Project. The additionality of the Project has been carefully checked, in doing so Bureau Veritas Certification has put the main focus on the following issues:

#### 3.7.1 Prior consideration of the clean development mechanism (104)

The start date of the Project identified in the PDD is 10/09/2010 on which the EPC contract for Engineering, Procurement, and Construction signed, /Ref-8/ prior to the PDD submitted to Bureau Veritas Certification for validation. The PDD has addressed



the serious consideration on the incentives from CDM prior to the Project implementation as per the “Guidelines on the demonstration and assessment of prior consideration of the CDM”, version 04 (Annex 13, EB 62), hereafter called “Guidelines Prior – Consideration” [5]

Complying with para.102/VVM, Bureau Veritas Certification verified this issue which was considered much related to the additionality of the Project and can conclude that the serious consideration under the context of the project has been addressed appropriately in accordance with above guidelines, consequently, the chronological events described with the relevant documented evidences can form the objective basis of the validation opinions of Bureau Veritas Certification.

Bureau Veritas Certification has checked all physical documents mentioned above and was able to verify that all documents are substantial at that situation in the Host Country. From the table above, Validation team confirms that the starting date of project activity is 10/09/2010 (the date on EPC contract for Engineering, Procurement, Construction was signed), which is the earliest date at which the implementation or construction or real action of the Project activity began.

According to calculation with reliable sources, the Project is financially unfeasible as the project IRR of the Project is 10.82%, lower than the benchmark without CDM revenue. Therefore, the PP finally made the investment decision of the Project based on serious consideration on the incentives of CDM and then commenced the CDM development prior to the implementation of the Project

By assessing the material actions taken by the PP, Bureau Veritas Certification confirmed that the PP considered seriously the incentives from CDM in the context of the Project before taking its real actions to secure CDM status for the Project in parallel with its implementation, which is in accordance with the requirements in “Guidelines Prior – Consideration”. Because the Project is a new project, appropriate notifications were already conducted and sent to EB and DNA of Vietnam

Pursuant to latest version (version 05) of Glossary of CDM terms, EB 47 [6], Bureau Veritas Certification was able to verify that the starting date of the Project of 10/09/2010 identified in the PDD is appropriate

The assessment of the Prior Consideration of the project activity is conducted by consulting the UNFCCC website, and the Bureau Veritas Certification hereby confirms that the Period for Comments related to this project activity is from 11<sup>th</sup> May 2011 to 09<sup>th</sup> Jun 2011, and that the CDM benefits were considered necessary in the decision to undertake the project as a proposed CDM project activity.

Based on the above assessment, the Bureau Veritas Certification hereby confirms that the proposed CDM project activity complies with the requirements of the latest version of the Guidance on prior consideration of CDM.

### **3.7.1.1 Historical information on project timeline**

It has been demonstrated by timeline of events of the Project that the CDM revenues was seriously considered in the decision to proceed with the Project prior to start of the Project, notification from Project participants to EB and Vietnamese DNA and, the continuing and real action taken to secure CDM status for the Project in parallel with its implementation

**Table 2 Timeline of Prior Consideration of CDM**

Actions taken	Date	Document verified with date
Environmental Impact Assessment Report (EIA)	27 <sup>th</sup> Feb 2009	/Ref-6/ ✓
Finalizing 1 <sup>st</sup> Feasibility Study Report with 26 MW	Mar 2009	/Ref-10/ ✓
Approval of EIA report	30 <sup>th</sup> Mar 2009	/Ref-7/ ✓
CDM consultant contract	06 <sup>th</sup> Oct 2009	/Ref-11/ ✓
Investment certificate for the Project	09 <sup>th</sup> Oct 2009	/Ref-12/ ✓
Meeting minutes between Project owner and Ka Dang commune's local people	16 <sup>th</sup> Oct 2009	/Ref-13/ ✓
Meeting minutes between Project owner and Thanh My town's local people	20 <sup>th</sup> Oct 2009	/Ref-14/ ✓
Meeting minutes between Project owner and Ma Coih commune's local people	22 <sup>nd</sup> Oct 2009	/Ref-15/ ✓



Official letter from Quang Nam PPC to DNA of Vietnam requests to support and verify the Project	26 <sup>th</sup> Oct 2009	/Ref-16/ ✓
Notification from Project Participants to DNA of Vietnam to inform about the Project activity	27 <sup>th</sup> Oct 2009	/Ref-17/ ✓
Notification from Project Participants to EB to inform about the Project activity	21 <sup>st</sup> Dec 2009	/Ref-18/ ✓
Confirmation from EB to receive notification of Project activity	05 <sup>th</sup> Feb 2010	/Ref-19/ ✓
FSR with installed capacity of 29 MW	15 <sup>th</sup> Apr 2010	/Ref-5/ ✓
Decision of Management board to develop the Project as CDM project	24 <sup>th</sup> Jun 2010	/Ref-20/ ✓
EPC contract	10 <sup>th</sup> Sep 2010 (Starting date of project activity)	/Ref-8/ ✓
Equipment contract for Electro – Mechanical supply	17 <sup>th</sup> Nov 2010	/Ref-21/ ✓
Official decision to increase Installed capacity to 29 MW by Government	26 <sup>th</sup> Apr 2011	/Ref-22/ ✓



### 3.7.2 Identification of alternatives (107)

Subsequently, Bureau Veritas Certification validated the additionality as addressed in the PDD of the Project

The plausible and credible alternatives to the Project were identified as per the “Tool for demonstration and assessment of additionality”, version 06.0 and ACM0002, version 12.2.0

- 1) The proposed project activity without CDM
- 2) Continuation of the current situation (The proposed project will not be built and the power will be supplied only from the National grid)

Complying with para.105/VVM, Bureau Veritas Certification considers the listed alternatives to be credible and complete. Hence step 1 of “Tool – Additionality” was applied appropriately.

### 3.7.3 Investment analysis (114)

Considering the baseline scenario as above identified, the Benchmark Analysis was applied in the Investment Analysis as per the sub – step 2b of Step 2 of “Tool – Additionality”

Bureau Veritas Certification verified the applicability of the benchmark that Local Lending Rate (LLR) of 13.6% used in the Project and can confirm that the data source mentioned in the PDD and this is the pre-tax value.

In accordance with Guidelines on Assessment of Investment Analysis, version 05, Annex 05, EB 62, (“Guidelines – Analysis” [7]), the selected benchmark is LLR.

Pursuant to sources from State Bank of Vietnam, Local Lending Rate from the beginning of 2010 to 24<sup>th</sup> Jun 2010 (Decision making date) is 13.6%. Bureau Veritas Certification can confirm that the selected value is reliable at the time of investment decision, which is in line with para.112/VVM

Furthermore, Bureau Veritas Certification reviewed the IRR calculation sheet and cross – checked the relevant regulations / laws / evidences and confirmed that

- The tariff used was determined based on Decision 73/QD - DTDL /Ref-23/, Bureau Veritas Certification confirms that the tariff used for investment analysis was properly selected
- Based on FSR and Investment License, Bureau Veritas Certification can confirm that Gross capacity, Annual net electricity generation, Total investment cost, preparation period of pre – construction and construction period were correctly applied
- By checking relevant regulations, Bureau Veritas Certification can confirm that Resources tax is appropriately. Resources tax is 2% for water used for





hydropower projects /Ref-24/, /Ref-25/. Because this Project applied pre – tax analysis, thus Income tax is not considered

Based on above conclusion, Bureau Veritas Certification reviewed the IRR calculation and found that the calculation is correct and in accordance with “Tool – Additionality”. As it shows, without CDM revenue, the project pre-tax IRR of the Project is 11.98%, which is lower than the benchmark (13.6%)

In the step of Sensitivity analysis, three financial indicators were identified with a variation range over  $\pm 10\%$  for evaluation:

- (1) Annual amount of electricity generated to the national grid
- (2) Investment costs
- (3) Feed in price set by EVN

As it shows, the IRR will remain below the benchmark of 13.6%

Bureau Veritas Certification reviewed the sensitivity analysis in the FSR and confirmed that the indicators identified and the variation range employed in the PDD are consistent with the approved FSR. Validation team reproduced the calculation based on the IRR spreadsheet and worked out the same outcomes as it shows.

As it shows, when indicators fluctuate within the range from -10% to +10%, the IRR will not reach the benchmark 13.6%. Furthermore, Bureau Veritas Certification analyzed the possibility of fluctuation beyond the range ( $\pm 10\%$ ) for these indicators

- (1) Annual amount of electricity generated to the national grid

In case of annual amount of electricity generated to the national grid increase 10%, Project IRR would be 13.22%, which is still lower than Benchmark of 13.6%

Therefore, Validation team confirms that annual amount of electricity generated to the national grid would not increase over 10%

- (2) Investment costs

In case of Investment costs reduce 10%; Project IRR would be 13.26%, which is still lower than Benchmark of 13.6%

Hence, Validation team confirms that investment costs would not decrease over -10%

- (3) Feed in price set by EVN

In case of electricity price increase 10%, Project IRR would be 13.22%, which is still lower than Benchmark of 13.6%

Therefore, Validation team confirms that the tariff of the Project is unlikely to increase by more than 10%.

By checking documents provided, Bureau Veritas Certification confirmed that the Project IRR is unlikely to reach benchmark when indicators fluctuate within range of  $\pm 10\%$





Accordingly Bureau Veritas Certification summarized as table below and raised **06** Corrective Action Requests and **02** Clarification Request for submission of the corresponding documented evidences.

**Table 3**

Parameter	Unit	Value	Document verified with date	Validation opinion
Gross capacity	MW	29	/Ref-5/ /Ref-22/	
Annual net electricity generation (net)	MWh	118,712	/Ref-5/	This can be calculated by: Annual electricity generation*(1-parasitic and loss load) = 120.52*(1-1%) = 118.712. It is considered correction.
Operating time	Hrs	4,156	/Ref-5/	
Currency exchange rate VND-USD		19,100	<a href="http://www.sbv.gov.vn/vn">http://www.sbv.gov.vn/vn</a> on 24 <sup>th</sup> Jun 2010	
Resources tax	%	2	/Ref-24/ /Ref-25/	
Investment cost	VND	634.4 billion	/Ref-12/	<p>it shows that the total investment cost is 634.372Billion VND, including: construction cost 291.045Billion VND, equipment cost 203.209Billion VND, other cost 59.152Billion VND, contingency cost 52.899 Billion VND, compensation cost 0.873Billion VND, management cost 6.537Billion VND and Consultancy cost 20.654Billion VND.</p> <p>The FSR is the basis of the decision to proceed with the investment in the project, i.e. that the period of time between the finalization of the FSR and the investment decision is sufficiently short for the DOE to confirm that it is unlikely in the context of the underlying project activity that the input values would have materially changed.</p> <p>The investment cost per kW for the proposed project is 21.88billion VND/MW, within the range of 11 to 27.19 billion VND/MW for local registered projects. Thus the total investment for the proposed projects is within normal range. Further confirmation letter of revised total investment of the</p>



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				<p>proposed project issued by the project owner was made on 10/11/2011 on adjusting total investment cost according to the report of revised total investment cost of the proposed project issued by the third party. The latest updated estimation of total investment is 643.575 billion VND (excluding tax), which confirms that the estimation made in the FSR (634.372 billion VND, excluding tax) that is used to make the investment decision is conservative.</p> <p>Therefore, the total investment of the proposed project is assessed to be credible.</p>
Total O&M cost	VND	6.344 billion	/Ref-26/	<p>This has been verified by Decision No. 2014/QD-BCN issued by the Ministry of Industry on 13 June 2007. The decision provides temporary guidelines for conducting the economic, financial and investment analysis and providing the purchasing-selling price frame for power generation projects, the O&amp;M cost per year for power plants which are below/equal 30 MW is 1% to 2% of total investment cost. PP has considered a cost of 1.0%. So, the validation team considered the O&amp;M cost of the project is conservative.</p>
Electricity tariff	VND	784.91	/Ref-23/	<p>The hydropower plant had not signed Power Purchase Agreement (PPA). Since the project activity has an installed capacity of less than 30MW, the project is subjected to the Avoided Cost Tariff according to government decision No.18/2008/QD-BCT dated 2008-07-18.</p> <p>At the time of the investment decision, government decision no.73/QD-DTDL was published by the Electricity Regulatory Authority of Viet Nam (under the Ministry of Industry and Trade) to announce the Avoided Cost Tariff for year 2010.</p> <p>The selling tariff of the electricity was estimated as of 784.91VND/kWh that is calculated from the government Decision No. 73/QD-DTDL dated 30/12/2009 on avoided cost tariff for the year 2010 and the generation capability during the wet and dry season provided in</p>




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			<p>the FSR.</p> <p>The validation team deemed the value from decision no.73/QD-DTDL was the most appropriate value to be considered by the project proponent because it is the best available information to project proponent during the time of the investment decision.</p> <p>The validation team had checked the FSR to confirm the electricity generation capability of the dry and wet seasons.</p> <p>PP confirmed that the tariff will last unless there has been a call for changes in the electricity tariff from the Government through the Ministry of Industry and Trade. It is therefore difficult to forecast tariff variations in the future. With no justifiable reasons for future changes in tariff, the validation team considered applying a fixed tariff to be appropriate.</p> <p>The validation team had compared the tariff with other recently registered CDM project.</p> <table border="1"> <tr> <td>Project ID</td> <td>Installed capacity (MW)</td> <td>VND/kWh</td> </tr> <tr> <td>3711</td> <td>82</td> <td>603</td> </tr> <tr> <td>3843</td> <td>34.5</td> <td>607</td> </tr> <tr> <td>4259</td> <td>19.5</td> <td>608</td> </tr> <tr> <td>4577</td> <td>18.6</td> <td>599</td> </tr> <tr> <td>4703</td> <td>28</td> <td>750</td> </tr> <tr> <td>4765</td> <td>16.2</td> <td>637.2</td> </tr> <tr> <td>Project activity</td> <td>29</td> <td>784.91</td> </tr> </table> <p>The tariff of the project activity is the highest than among the recent registered projects. Hence, the tariff applied by the project is conservative.</p> <p>The validation team concluded that the tariff applied by the project participant is appropriate</p>	Project ID	Installed capacity (MW)	VND/kWh	3711	82	603	3843	34.5	607	4259	19.5	608	4577	18.6	599	4703	28	750	4765	16.2	637.2	Project activity	29	784.91
Project ID	Installed capacity (MW)	VND/kWh																									
3711	82	603																									
3843	34.5	607																									
4259	19.5	608																									
4577	18.6	599																									
4703	28	750																									
4765	16.2	637.2																									
Project activity	29	784.91																									
Period of financial assessment	Year	37	<p>According to Guidelines on the Assessment of Investment Analysis (Version 05.0), the project IRR calculations shall reflect the period of expected operation of the underlying project activity (technical lifetime). Since the equipments are major components of a hydropower plant, the technical lifetime of the project is determined to be 37 years based on the expected operation hour and the default technical lifetime provided in Annex 15 of EB50</p>																								




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				<p>Meeting Report. Thus the applied period of financial assessment has properly reflected the period of expected operation of the underlying project activity (technical lifetime is 37 years) and is considered appropriate. Further, this has been verified by Decision No. 2014/QD-BCN issued by the Ministry of Industry on 13 June 2007. The decision provides temporary guidelines for conducting the economic, financial and investment analysis and providing the purchasing-selling price frame for power generation projects, financial assessment period for power plants which are below/equal 30 MW is 20 to 40 years. The project proponent had taken the expected financial assessment period of 37 year within the range provided in the decision. So, the applied period of financial assessment is considered conservative.</p>
Plant load Factor	%	47	/Ref-5/	<p>The plant load factor is calculated based on the estimated operation hours of the hydropower plant as below:  <math>PLF = 4156 / 8760 = 47\%</math>.</p> <p>Considering the decision in EB 48, Annex 11, clause 3 the PLF is assessed as applicable and correct. The FSR of the project activity has been completed by a third party entity approved by the national authority. Hence the consulting company would have certain expertise in determining the values in the FSR.</p> <p>The expected operational hours has been determined by hydrological cycle of river basin. The hydrological study was conducted based on long term measurements of rain data, river flow and river basin.</p> <p>Furthermore, the operational hours stated in the FSR has been approved by Department of Industry and Trade. Hence the value has been checked and confirmed.</p> <p>The validation team compared the PLF of the project activity with those recently registered CDM projects that are located near the project activity location. The PLF of the project activity is within the range of those</p>



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				registered CDM projects. The validation team concluded that Operation Hours and PLF applied by the project participant is appropriate
Parasitic and loss load	%	1.5	/Ref-5/	During site visit, the validation team has confirmed the same from the approved FSR. The parasitic and loss load of the proposed project has been cross-checked with the registered CDM project of Viet Nam, the range is from 1% to 3.2%, it has been concluded that the parasitic and loss load considered by the PP lies within the acceptable range and validated as appropriate.
Fair value		0		The cost of depreciation for the equipment and construction applied is consistent with the FSR and is in accordance with Decision 206/2003/QD-BTC issued on 12/12/2003 which requires a linear depreciation in 20 years for construction and 10 years for equipment. Full value of assets has been completely depreciated thus no fair value remains at the end of the assessment period (fair value is zero). The validation team concluded that the investment analysis of the project activity has been determined according the technical lifetime of the project activity. Hence a fair value (residue value) is not necessary to be included in the investment analysis. The validation team considered it was rational.

Operating lifetime of the Project, Plant Load Factor and Operation & Maintenance Cost (O&M costs) are defined in the FSR /Ref-5/, which is made by Consultant and Investment on Hydropower construction JSC and approved by Quang Nam PPC. This organization is authorized to approve Feasibility Study Report of this kind of Power Project (hydropower projects), consistently with Vietnamese regulation. By means of document checking, Validation team confirms that the FSR is made and approved compliantly.

Complying with para.112/VVM, Bureau Veritas Certification, based on the assessment result by the financial expert engaged, hereby confirms that the underlying assumptions are appropriate and the financial calculations are correct.

### 3.7.4 Barrier analysis (118)



The step 3 **Barrier analysis** was not applied for the Project.

### 3.7.5 Common practice analysis (121)

The Common practice analysis was addressed as per Step 4 of “Tool – Additionality” and latest rules issued by EB

The Project is a newly built 29 MW hydro power plant in Quang Nam province, Vietnam. Validation team has reviewed the “Government Decree No.45/2001/ND-CP on power generation and consumption”, issued on 02<sup>nd</sup> Aug 2001 /Ref-27/. Based on this decree, not only state – owned entities but also other entities were allowed to invest in and generate electricity. Before the issuance of this decree, only state – owned companies were permitted to invest and operate hydropower projects.

Besides, project proponent has considered Vietnam Construction code – TCXDVN 285: 2002 – “Irrigation projects – Major standards on designing” /Ref-28/ to classify the projects listed against the criteria: similar scale, and take place in a comparable environment with respect to regulatory framework and investment climate. Bureau Veritas Certification had checked these regulations and confirmed that the following 5 groups are classified reasonably to select the same scale range having comparable environment.

- Group I: with installed capacity equal and larger than 300 MW
- Group II: with installed capacity smaller than 300 MW, but equal and larger than 50MW
- Group III: with installed capacity smaller than 50 MW, but equal and larger than 5 MW
- Group IV: with installed capacity smaller than 5 MW, but equal and larger than 0.2 MW
- Group V: with installed capacity up to 0.2 MW

Because the installed capacity of the Project is 29 MW, the Project falls into group III

Therefore, in accordance with “Tool – Additionality”, Bureau Veritas Certification considered that the activities similar to the Project should be the hydro power plants located in Vietnam, started the construction activities post August 2001, with installed capacity falling into Group III

By checking the list of hydropower plants provided by Institute of Energy, it is found that in Vietnam, 06 hydropower projects falls into Group III: Nam Mu, Ea Krong Rou, Suoi Sap, Nam Tha 6, Ngoi Xan 1, Na Loi

Na Loi hydropower projects started construction in 2000, before Aug 2001

Nam Tha 6 and Ngoi Xan 1 were developed as CDM projects

<http://cdm.unfccc.int/UserManagement/FileStorage/HWAFNGZRTMU51V86XDB2LP40I79KJE>



<http://cdm.unfccc.int/UserManagement/FileStorage/ZTSNIRG1O4E8YX3H2WFJD0LBA5KM7Q>

Therefore, 3 remaining projects would be considered to compare in Common Practice analysis

Suoi Sap hydropower project has borrowed ODA soft – loan from India. Hence, Suoi Sap project has not faced similar barriers as the proposed project. By checking “Government Decree No. 17/2001/NĐ-CP” /Ref-29/, Bureau Veritas Certification can confirm that Suoi Sap is essential difference to the Project

With Ea Krong Rou hydropower project, through accessing the link with public information of Ea Krong Rou project, Validation team confirms that Ea Krong Rou used ODA fund by India. Therefore, this project is excluded from the common practice

Nam Mu hydropower project was invested and developed by Song Da Construction Corporation 1, which is a state – owned corporation. By checking decisions issued by Government, Song Da Construction Corporation 1 was founded in order to develop construction and power industries; develop national socio – economical objectives. Furthermore, by checking the Prospectus of Nam Mu Hydropower JSC (organisation to manage Nam Mu hydropower project), Validation team confirms that Nam Mu hydropower project was developed by State – owned organisation for social development goals rather than profit. It would not face barriers as the proposed Project. Hence, Validation team determines that Nam Mu hydropower project is excluded from the common practice /Ref-30/, /Ref-31/, Ref-32/

Complying with para.119/VVM, based on above demonstration that in accordance with “Tool – Additionality” and supported by reliable data sources, Bureau Veritas Certification hereby confirms that the proposed CDM project activity is not common practice.

### **3.8 Monitoring plan (124)**

The Project uses the approved consolidated monitoring methodology ACM0002, version 12.2.0 for grid connected electricity generation from renewable sources

Applicability of this methodology is justified in PDD as it involves grid connected renewable power generation using hydro power. Refer discussions on the validity of the methodology at section 3.5.1 above

The combined margin emission factor is determined ex – ante based on the most recent information available. Accordingly the monitoring plan includes quantity of electricity exported to and quantity of electricity imported from the grid by the Project. The area of reservoir measured in the surface of the water and the installed capacity of the Project after the implementation of the Project





According to ACM0002 version 12.2.0, no leakage need to be considered for the Project because no energy generating equipment is transferred from or to the site, thus  $LE_y = 0$

Operational management for the Project activity is comprehensively detailed in the PDD and this includes description of the responsibility, training, procedure reference, equipment details, calibration frequency maintenance needs are clearly mentioned. Archiving of the records was indicated and Validation team is of opinion that the retrievability of the CDM project activity records is pro-actively considered satisfactorily.

Meters systems of the Project include 2 systems: Main system and back up system  
2 meter systems will be installed at the connected point of the Project  
Validation team confirm that the data from these meters is properly taken into account. And in case of emergency where not sufficient electricity for power house, the Project will import electricity from grid via this connection  
Both the electricity exported and imported by the Project will be continuously measured and recorded on a monthly basis, and doubled checked by receipts.

Accuracy class of main and backup meters above are no less than 0.2s and 0.5s, respectively. They are subjected to periodic calibration by authorized third parties in accordance with relevant regulation /Ref-33/. The area of the reservoir measured in the surface of the water will be calculated based on relevant maps by supplied party after the implementation of the Project activity when the reservoir is full; the installed capacity of the Project will be checked by the nameplate of the generators

Monitoring of sustainable development indicators is not required for such Projects in Vietnam in the light of minor environmental impacts

Complying with para.122/VVM, Bureau Veritas Certification hereby confirms that the Project participants are able to implement monitoring plan.

### **3.9 Sustainable development (127)**

The host Party's DNA confirmed the contribution of the project to the sustainable development of the host Party. Refer to item 3.1 of this report.

### **3.10 Local stakeholder consultation (130)**

The steps to invite local stakeholder consultation were implemented accordingly with the regulation on development of CDM projects in Vietnam.

Local stakeholders were informed about the Project by the Project owner and invited to join the official meeting with project owner to provide comments one week later (16<sup>th</sup>, 20<sup>th</sup> and 22<sup>nd</sup> Oct 2009). During the meeting, social – economic and environmental impacts of the project were demonstrated to local stakeholders including:





representatives of communes' people councils, committees and villages /Ref-13/; /Ref-14/; /Ref-15/

Subsequently, other meetings were held internally in local communes

In Oct 2009, the proposed project was informed to DNA Vietnam and requested to be supported to develop by People Provincial Committee of Quang Nam /Ref-16/. Besides, the People Provincial Committee approved the general plans for compensation and resettlement of the Project /Ref-34/

The survey showed that the proposed project would impact positively to social – economic, environmental protection. The proposed project would be strongly supported by local people. Validation team conducted interview the local stakeholders during on – site visit of the validation process and received consistent responses.

Complying with para.130/VVM, Bureau Veritas Certification hereby confirms that the project participant has appropriately implemented necessary and appropriate measures. The stakeholders also confirmed the process of invitation as described in the PDD. The validation team hereby confirms that the process of local stakeholder consultation is observed to be adequate.

### **3.11 Environmental impacts (133)**

The validation team ensured that the Environmental Impact Assessment Report was carried out in Feb 2009 and approved by Quang Nam People Committee on 30<sup>th</sup> Mar 2009 /Ref-6/; /Ref-7/.

The environmental impact results from the Project have been identified and analyzed in the PDD. By means of checking EIA report and approval, Validation team is able to ensure that the environmental impacts occur mainly during the construction time due to waste water, dust, exhaust gases, noise pollution and solid waste. All above impacts would be within an acceptable limit by carrying out corresponding mitigation measures as per statement of the EIA

Complying with para.131/VVM, Bureau Veritas Certification hereby confirms environmental impacts of the Project (for construction and operation stage) were assessed approved legally.

## **4 COMMENTS BY PARTIES, STAKEHOLDERS AND NGOS**

The PDD using methodology ACM0002, version 12.1.0 was web hosted on the UNFCCC for global stakeholders' comments as per CDM requirements. The project was web hosted from 11<sup>th</sup> May 2011 to 09<sup>th</sup> Jun 2011.

Comments were received from 02 persons. The project participant provided response to these comments. Validation team took due account of these comments and the



respective responses while making the validation opinion. The details of the comments received, responses by the project participants and the explanation of how due account of these is taken by the validation team are attached as Appendix B with this validation report.

## 5 VALIDATION OPINION

Bureau Veritas Certification has performed a validation of the Song Bung 6 hydropower project in Vietnam. The validation was performed on the basis of UNFCCC criteria and host country criteria and also on the criteria given to provide for consistent project operations, monitoring and reporting.

The validation consisted of the following three phases: i) a desk review of the project design and the baseline and monitoring plan; ii) follow-up interviews with project stakeholders; iii) the resolution of outstanding issues and the issuance of the final validation report and opinion.

Project participants used the latest “Tool for Demonstration and Assessment of Additionality” (version 06.0), Paragraph 54 of EB38 and “Guidelines on the demonstration and assessment of prior consideration of the CDM, version 04” to demonstrate the additionality of the Project. In line with this tool, the PDD provides analysis of investment barriers to determine that the project activity itself is not the baseline scenario.

By synthetic description of the project, the project is likely to result in reductions of GHG emissions partially. An analysis of the financial barriers demonstrates that the proposed project activity is not a likely baseline scenario. Emission reductions attributable to the project are hence additional to any that would occur in the absence of the project activity. Given that the project is implemented and maintained as designed, the project is likely to achieve the estimated amount of emission reductions of 478,975 tCO<sub>2</sub>e over chosen 7 – year renewable crediting period

The review of the PDD (version 2.3) and the subsequent follow-up interviews have provided Bureau Veritas Certification with sufficient evidence to determine the fulfillment of stated criteria. In our opinion, the project correctly applies the baseline and monitoring methodology ACM0002, version 12.2.0 and meets the relevant UNFCCC requirements for the CDM and the relevant host country criteria.

Bureau Veritas Certification thus requests registration of Song Bung 6 hydropower project as CDM project activity.



## 6 REFERENCES

### Category 1 Documents:

Documents provided by Type the name of the company that relate directly to the GHG components of the project.

- /Ref-1/ PDD version 1.0, dated on 25<sup>th</sup> Apr 2011
- /Ref-2/ PDD version 2.3, dated on 03<sup>rd</sup> Oct 2011
- /Ref-3/ LoA from DNA of Vietnam (host country), dated on 28<sup>th</sup> September 2011 (No. 50/2011/DMHCC-BCD)
- /Ref-4/ LoA from DNA of Switzerland, dated on 23<sup>rd</sup> August 2011
- /Ref-5/ Feasibility Study Report (FSR) established by Consultant and Investment on Hydropower Construction Joint Stock Company, dated on 15<sup>th</sup> Apr 2010
- /Ref-6/ Environmental Impact Assessment (EIA) established by Dat Phuong JSC and Consultant and Investment on Hydropower Construction JSC on 27<sup>th</sup> Feb 2009
- /Ref-7/ Approval of Environmental Impact Assessment Report, issued by Quang Nam People Committee, dated on 30<sup>th</sup> Mar 2009
- /Ref-8/ EPC (for Engineering, Procurement, Construction) Contract, signed between SBJSC and Dat Phuong Joint Stock Company, dated on 10<sup>th</sup> Sep 2010
- /Ref-9/ Calculation emission factor of Vietnamese Electricity Grid issued by DNA of Vietnam, dated on 26<sup>th</sup> March 2010
- /Ref-10/ 1<sup>st</sup> Feasibility Study Report with Installed capacity of 26 MW, dated in Mar 2009
- /Ref-11/ CDM consultant contract signed between SBJSC and VNEEC, dated on 06<sup>th</sup> Oct 2009
- /Ref-12/ Investment Certificate for the Project, issued by Quang Nam PPC, dated on 09<sup>th</sup> Oct 2009
- /Ref-13/ Meeting minutes between Project owner and Ka Dang commune's local people, dated on 16<sup>th</sup> Oct 2009
- /Ref-14/ Meeting minutes between Project owner and Thanh My town's local people, dated on 20<sup>th</sup> Oct 2009
- /Ref-15/ Meeting minutes between Project owner and Ma Cooih commune's local people, dated on 22<sup>nd</sup> Oct 2009
- /Ref-16/ Official letter from Quang Nam PPC to DNA of Vietnam, dated on 26<sup>th</sup> Oct 2009
- /Ref-17/ Notification of the Project to Vietnam DNA, dated on 27<sup>th</sup> Oct 2009
- /Ref-18/ Notification of the Project to EB, dated on 21<sup>st</sup> Dec 2009
- /Ref-19/ Confirmation from EB to receive notification of Project activity, dated on 05<sup>th</sup> Feb 2010
- /Ref-20/ Decision of Management board to develop the Project as CDM project, dated on 24<sup>th</sup> Jun 2010
- /Ref-21/ Electro – Mechanical equipment supply contract, signed between SBJSC and Tianjin Tianfa Heavy Machinery & Hydro power equipment



- manufacture Co., Ltd, dated on 17<sup>th</sup> Nov 2010
- /Ref-22/ Decision to approve new Installed capacity of 29 MW, issued by Quang Nam PPC, dated on 26<sup>th</sup> Apr 2011
- /Ref-23/ Decision 73/QD – DTDL, issued by Ministry of Industry and Trade, regarding to Avoid cost tariff in 2009, dated on 30<sup>th</sup> Dec 2009
- /Ref-24/ Circular No 124/2009/TT-BTC, issued by Ministry of Finance, dated on 17<sup>th</sup> June 2009
- /Ref-25/ Decision 588/QD-BTC, issued by Ministry of Finance, dated on 22<sup>nd</sup> Mar 2010
- /Ref-26/ Decision 2014/QD-NDLK, issued by Ministry of Industry on 13<sup>th</sup> June 2007
- /Ref-27/ Government Decree No.45/2001/ND-CP on power generation and consumption, dated on 02<sup>nd</sup> August 2001
- /Ref-28/ Vietnam Construction code – TCXDVN 285 : 2002, Major standards on designing
- /Ref-29/ Government Decree No. 17/2001/NĐ-CP, dated on 04<sup>th</sup> May 2001
- /Ref-30/ Decision 30/TTg, issued by Prime Minister, dated on 07<sup>th</sup> March 1994
- /Ref-31/ Decision 31/TTg, issued by Prime Minister, dated on 07<sup>th</sup> March 1994
- /Ref-32/ Prospectus of Nam Mu hydropower Joint Stock Company  
Decision 65/2002/QD-BKHCNMT on promulgation “The list of meter equipment must be calibrated and verified and the verification procedures”
- /Ref-33/ issued by Ministry of Science, Technology and Environment, dated on 19<sup>th</sup> August 2002
- /Ref-34/ Compensation plan for people, households affected by the Project, issued in Jun 2010

### Category 2 Documents:

Background documents related to the design and/or methodologies employed in the design or other reference documents.

- [1] Guidelines Project Design Document (CDM – PDD), version 07, EB41, Annex 12
- [2] ACM0002, version 12.2.0, dated on 25<sup>th</sup> Nov 2011
- [3] Tool to calculate the emission factor for an electricity system, version 2.2.1, EB 63<sup>rd</sup>, dated on 29<sup>th</sup> Sep 2011
- [4] Tool for Demonstration and Assessment of Additionality, version 06.0 dated on 25<sup>th</sup> Nov 2011
- [5] Guidelines on the demonstration and assessment of prior consideration of the CDM, version 04 (Annex 13, EB 62), dated on 15<sup>th</sup> July 2011
- [6] Glossary of CDM terms version 05 of EB 47
- [7] Guidelines on Assessment of Investment Analysis, version 05, Annex 05, EB 62



**Persons interviewed:**

List persons interviewed during the validation or persons that contributed with other information that are not included in the documents listed above.

- /1/ Mr. Vu Van Quang, Project Manager of VNEEC
- /2/ Ms. Tran Tuyet Huong, Project Manager of VNEEC
- /3/ Mr. Tran Trong Viet, Project Manager of VNEEC
- /4/ Ms. Dang Thi Hong Hanh, Deputy Executive Director of VNEEC
- /5/ Mr. Nguyen Tien Hai, Project Manager of VNEEC
- /6/ Ms. Nguyen Anh Thu, Project developer
- /7/ Ms. Nguyen Hong Loan, Project developer
- /8/ Mr. Nguyen Xuan Binh, Project Manager of SBJSC
- /9/ Mr. Do Manh Hung, Project Manager of SBJSC
- /10/ Mr. To Ram Uoi, Vice President of Thanh My town People Committee
- /11/ Mr. A Lang Uon, Local people, affected by the Project
- /12/ Ms. A Pat Thi Nhu, Local people, affected by the Project

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## 7 CURRICULA VITAE OF THE DOE'S VALIDATION TEAM MEMBERS

Include CV of Team Leader, Team Members, Experts, Internal technical Reviewer

Mr. Tran Viet Hoang	Team Leader, CDM Lead verifier	He has been working in Bureau Veritas Certification for 2 year as Lead Auditor of ISO 9001; ISO 14001; OHSAS 18001. He has attended training courses and obtained certificate of CDM lead verifier and ISO 14064 for Greenhouse Gases Accounting. He has involved in 35 CDM projects validation / verification activities.
Mr. Nguyen Hong Linh	Team member, CDM Verifier	He has been working in Bureau Veritas Certification for 6 months as CDM Verifier and auditor of ISO 9001; HACCP. He has received the training and obtained certificate of CDM verifier.
Mr. Nguyen Huy Vu	Financial expert	He has been working in Long Hau Real Estate Management for 2 years as Investment and Business Development Director. He has experience in Financial Director and Investment Director since 1995. He has not participated any CDM projects as Project participants, Project developers so far. He has involved 5 CDM projects as Financial expert.
Mr. Sushil Budhia	Financial expert	He has been practicing as Chartered Accountant for 25 years and he has very wide experience on project finance, taxation and financial auditing. He has undergone training on Clean Development Mechanism and has conducted verification of financial indicators like IRR for more than 70 CDM projects.
Mr. Ashok Mammen	Technical Reviewer	He has PhD (Oils & Lubricants), Masters (Analytical chemistry). He has over 20 years of experience in petrochemical sector. Dr. Mammen is a lead auditor and tutor for environment, safety and quality management systems and a CDM lead verifier and lead tutor for GHG projects. He has been involved in the validation and verification processes of more than 100 CDM, JI and other GHG projects.

## APPENDIX A: COMPANY CDM PROJECT VALIDATION PROTOCOL

**Table 1** Validation requirements based on the Clean Development Mechanism Validation and Verification Manual (Version 01.2) and methodology ACM0002 (Version 12.2.0) – “Consolidated baseline methodology for grid-connected electricity generation from renewable sources”

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
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CHECKLIST QUESTION	Ref.	§	COMMENTS		Draft Concl	Final Concl
<b>1. Approval</b>			<b>COUNTRY A (Vietnam)</b>	<b>COUNTRY B (Switzerland)</b>		
a. Have all Parties involved approved the project activity?	VVM	44	CAR-1 was issued  CAR-1: The Letter of Approval from Vietnam is not available in this stage of validation.	CAR-2 was issued  CAR-2: The Letter of Approval from Switzerland will be provided before submission for registration.	<del>CAR-1</del> CAR-2	OK
b. Has the DNA of each Party indicated as being involved in the proposed CDM project activity in section A.3 of the PDD provided a written letter of approval? (If yes, provide the reference of the letter of approval, any supporting documentation, and specify if the letter was received from the project participatn or directly from the DNA)	VVM	45	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
c. Does the letter of approval from DNA of each Party involved:	VVM	45			OK	OK
i. confirm that the Party is a Party of the Kyoto Protocol?	VVM	45.a	Vietnam has ratified the Kyoto Protocol on 25 <sup>th</sup> Sep 2002	Switzerland has ratified the Kyoto Protocol on 09 <sup>th</sup> July 2003	OK	OK
ii. confirm that participation is voluntary?	VVM	45.b	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
iii. confirm that, in the case of the host Party, the proposed CDM project activity contributes to the sustainable development of the country?	VVM	45.c	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
iv. Refers to the precise proposed CDM project activity title in the PDD being submitted for registration?	VVM	45.d	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
d. Is(are) the letter(s) of approval unconditional with	VVM	46	Yes, it is unconditional	Yes, it is unconditional	OK	OK



CHECKLIST QUESTION	Ref.	§	COMMENTS		Draft Concl	Final Concl
respect to (i) to (iv) above?			in Vietnam	in Switzerland		
e. Has(ve) the letter(s) of approval been issued by the respective Party's designated national authority (DNA) and is valid for the CDM project activity under validation?	VVM	47	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
f. Is there doubt with respect to the authenticity of the letter of approval?	VVM	48	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
g. If yes, was verified with the DNA that the letter of approval is authentic?	VVM	48	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
<b>2. Participation</b>			PP1 (Song Bung 6 Joint Stock Company – SBJSC) PP2 (Energy and Environment Consultancy Joint Stock Company – VNEEC)	PP3 (Vietnam Carbon Assets Ltd)		
a. Have all project participants been listed in a consistent manner in the project documentation?	VVM	51	Yes	Yes	OK	OK
b. Has the participation of the project participants in the project activity been approved by a Party to the Kyoto Protocol?	VVM	51	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
c. Are the project participants listed in tabular form in section A.3 of the PDD?	VVM	52	Yes, relevant sections in the PDD have been checked. No deviation has been found.	Yes	OK	OK
d. Is the information in section A.3 consistent with the contact details provided in annex 1 of the PDD?	VVM	52	Yes	Yes	OK	OK
e. Has the participation of each of the project participants been approved by at least one Party	VVM	52	Yes	Yes	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS		Draft Concl	Final Concl
involved, either in a letter of approval or in a separate letter specifically to approve participation? (Provide reference of the approval document for each of the project participants)						
f. Are any entities other than those approved as project participants included in these sections of the PDD?	VVM	52	No		OK	OK
g. Has the approval of participation issued from the relevant DNA?	VVM	53	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
h. Is there doubt with respect to (g) above?	VVM	53	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
i. If yes, was verified with the DNA that the approval of participation is valid for the proposed CDM project participant?	VVM	53	Pending on close CAR-1	Pending on close CAR-2	Pending	OK
<b>3. Project design document</b>						
a. Is the PDD used as a basis for validation prepared in accordance with the latest template and guidance from the CDM Executive Board available on the UNFCCC CDM website?	VVM	55	Yes, the latest version of the PDD template has been used. This has been cross – checked with the format provided in the UNFCCC website		OK	OK
b. Is the PDD in accordance with the applicable CDM requirements for completing the PDD?	VVM	56	Yes		OK	OK
c. In CDM-PDD section A.1 are the following provided?	EB 41	Ann 12			OK	OK
i. Title of project	EB 41	Ann 12	Yes, title of project has been addressed sufficiently as Song Bung 6 hydropower Project		OK	OK
ii. Current version number and date of document	EB 41	Ann 12	Version of PDD (version 2.3) and date of that (03/10/2011) were addressed adequately		OK	OK
d. In CDM-PDD section A.2 are following provided (max. one page)?	EB 41	Ann 12			OK	OK
i. A brief description of the project activity covering purpose which includes the scenario	EB 41	Ann 12	Yes, in the section A.2, the scenario existing prior to the implementation of the proposed project		CAR-3 CAR-4	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
existing prior to the start or project, present scenario and baseline scenario			<p>activity has been described. It has been also considered as baseline scenario</p> <p>The purpose of the proposed project activity is to utilize the waters of the Bung river in order to generate about 226,884.9 MWh (net) of hydro electric per year, which will be exported to the Vietnamese Electricity grid via a new constructed transmission line</p> <p>The baseline scenario is the same as the scenario existing before the implementation of the proposed project</p> <p>CAR-3, CAR-4, CL-1 were issued</p> <p>CAR-3: In the PDD version 1.0, section A.2, PDD stated that the Project will supply the Electricity to the National grid via signed Power Purchasing Agreement (PPA) between Project owner and Electricity Corporation Vietnam (EVN). However, by cross – checking documents and interviewing, Validation team confirm that the PPA was not signed at the stage of validation</p> <p>CAR-4: In the PDD version 1.0, source 8 and source 29 state that the parasitic and loss load is 1%. However, source 2 and in the excel spread sheet, the applied parasitic and loss load is 1.5%</p> <p>CL-1: Information of the distance of the transmission line is not available in the PDD version 1.0</p>	CL-4	

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
ii. Explanation on how the GHG emission reductions are effected	EB 41	Ann 12	Yes The Project is to utilize the hydropower resource for power generation which will be supplied to Vietnam national electricity grid and displace the power from fossil fuel fired power plants	OK	OK
iii. The PP's vies on the contribution of project activity to sustainable development	EB 41	Ann 12	Yes The contribution to sustainable development is included in section A2 of the PDD. Validation team checked and confirmed by document checking (FSR)	OK	OK
iv. Are there any changes/modifications compared to the webhosted PDD?	EB 41	Ann 12	1. Distance of transmission line (13km) is provided in the PDD latest version 2.1 2. Ka Dang Commune was provided in the location of the Project	OK	OK
e. In CDM-PDD section A.3 are following provided in the tabular format?	EB 41	Ann 12		OK	OK
i. List of project participants and parties	EB 41	Ann 12	Yes. The private entities involved in the project activity are sufficiently listed at section A3 of the PDD.	OK	OK
ii. Identification of Host Party			Host Party (Vietnam): Song Bung Joint Stock Company (SBJSC) Energy and Environment Consultancy Joint Stock Company (VNEEC) Annex I Party (Switzerland): Vietnam Carbon Assets Ltd	OK	OK
iii. Indication whethre the Party wishes to be considered as project participant	EB 41	Ann 12	All Parties do not wish to be considered as Project Participant	OK	OK
f. In CDM-PDD section A.4.1 are following provided?	EB 41	Ann 12			
i. Technical description, location, host party(ies) and address as required	EB 41	Ann 12	Yes Ma Cooih and Ka Dang Communes, Dong Giang	CAR-5	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
			<p>District and Thanh My Town, Nam Giang District, Quang Nam Province, Vietnam</p> <p>CAR-5 was issued  CAR-5: By means of checking provided documents, Validation team confirm that the Project located on Bung river, in Ma Cooih and Ka Dang communes, Dong Giang district and Thanh My town, Nam Giang district, Quang Nam province. However, in the PDD version 1.0, section A.2 and A.4.1.4, Ka Dang Commune is not mentioned appropriately</p>		

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
ii. Detailed physical location with unique identification of the project activity (eg. Longitude/latitude) – not to exceed one page	EB 41	Ann 12	Yes Longitude and latitude are provided. The geographical coordinates of dam: Longitude: 107°45'28" East Latitude: 15°48'46" North	OK	OK
iii. Are there any changes/modifications compared to the webhosted PDD?	EB 41	Ann 12	Ka Dang Commune was indicated in the location of the Project	OK	OK
g. In CDM-PDD section A.4.2 is the list of categories of project activities provided?	EB 41	Ann 12	Category of project activities has been provided in relevant section: Sectoral scope 1: Energy Industries (Renewable / Non – renewable sources)	OK	OK
h. In CDM-PDD section A.4.3 are following provided?	EB 41	Ann 12			
i. A description of how environmentally safe and sound technology, and know-how, is transferred to the Host Party(ies)	EB 41	Ann 12	Yes. The turbines are imported from China. The project owner selected the suppliers for turbines and alternators through tender. They satisfied Vietnamese standard.  CAR-6, CL-2 were issued CAR-6: In the PDD version 1.0, section A.4.3, “the scope of activities/measures that are being implemented within the project activity” was not demonstrated as per requirements in EB41, Annex 12 CL-2: cosφ of the Generator is not available in the Technical Specifications of the Project	<del>CAR-6</del> CL-2	OK
ii. Explanation of purpose of project activity with scenario existing prior to the start of project, scope or present activities and the baseline	EB 41	Ann 12	The project is a newly built hydro electric power plant The baseline scenario is the scenario existing	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
scenario			prior to the implementation of the proposed project activity Presently, prior to the implementation of the proposed project activity would have been generated by the operation of grid – connected power plants and by the addition of other new generation sources		
iii. List and arrangement of the main manufacturing/production technologies, systems and equipments involved	EB 41	Ann 12	Refer the specification listed in Table 1 in the section A.4.3 of the PDD Pending on closing CL-2	Pending	OK
iv. The emissions sources and GHGs involved	EB 41	Ann 12	Yes, the project is to reduce greenhouse gas emissions of CO <sub>2</sub> produced in Vietnamese national electricity grid	OK	OK
v. Are there any changes/modifications compared to the webhosted PDD?	EB 41	Ann 12	1. Scope of the Project's activities and monitoring information were provided in the PDD version 2.2. 2. Information of Imported equipment was more sufficiently provided 3. cosφ of the Generator was provided	OK	OK
i. In CDM-PDD section A.4.4 is the estimation of emission reductions provided as requested in a tabular format?	EB 41	Ann 12	Renewable crediting periods were chosen: Approximate emission reductions are provided. Annual emission reductions of 68,425 tonnes CO <sub>2</sub> e are estimated for the first crediting period	OK	OK
j. In CDM-PDD section A.4.5 is Information regarding Public funding provided?	EB 41	Ann 12	Yes Information provided: no public funding from Annex I parties is involved of this project	OK	OK
k. In CDM-PDD section B.1 are following provided?	EB 41	Ann 12		OK	OK
i. The approved methodology and version number	EB 41	Ann 12	In the PDD for public comments, the applied methodology is ACM0002, "Consolidated baseline methodology for grid – connected electricity	OK	OK



CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
			generation from renewable sources”, version 12.1.0		

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
ii. Any methodologies or tools which the above approved methodology draws upon and their version number	EB 41	Ann 12	Yes. Below tools were used: - Tool to calculate the emission factor for an electricity system (version 2.2.1) - Tool for the demonstration and assessment of additionality (version 6.0)  CAR-7 was issued CAR-7: In the PDD version 1.0 (dated 25 <sup>th</sup> Apr 2011); the version of "Tool to calculate the emission factor for an electricity system" (version 2) is not latest version. Version 2.1 of that tool was already issued on 15 <sup>th</sup> Apr 2011	CAR-7	OK
l. In CDM-PDD section B.2 are following provided?	EB 41	Ann 12		OK	OK
i. Justification of the choice of methodology that the project activity meets each of the applicability conditions	EB 41	Ann 12	Yes	OK	OK
ii. Documentations with references that had been used. This can be provided in Annex 3 instead	EB 41	Ann 12	Yes	OK	OK
m. In CDM-PDD section B.3 are following provided?	EB 41	Ann 12		OK	OK
i. Description of all sources and gases included in the project boundary in the table	EB 41	Ann 12	Yes. Only emission of CO2 is considered	OK	OK
ii. A flow diagram of the project boundary physically delineating the project activity	EB 41	Ann 12	Yes	OK	OK
iii. The flow diagram with all equipments, systems and flows of mass and energy etc	EB 41	Ann 12	Yes	OK	OK
n. In CDM-PDD section B.4 are following provided?	EB 41	Ann 12		OK	OK
i. Explanation how the most plausible baseline scenario is identified in accordance with the	EB 41	Ann 12	Yes. Baseline scenarios are identified plausible with ACM0002, version 12.2.0	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
selected baseline methodology					
ii. Justification of key assumptions and rationales	EB 41	Ann 12	No	OK	OK
iii. Transparent illustration of all data used to determine the baseline scenario (variables, parameters, data sources, etc.)	EB 41	Ann 12	Yes	OK	OK
iv. A transparent and detailed description of the identified baseline scenario, including a description of the technology that would be employed and/or the activities that would take place in the absence of the proposed project activity	EB 41	Ann 12	Yes	OK	OK
v. Are there any changes/modifications compared to the webhosted PDD?	EB 41	Ann 12	There is no change or modifications compared with web hosted PDD, version 1.0	OK	OK
o. In CDM-PDD section B.5 are following provided?	EB 41	Ann 12		OK	OK
i. Explanation of how and why this project activity is additional and therefore not the baseline scenario in accordance with the selected baseline methodology	EB 41	Ann 12	Yes. Investment analysis is used for demonstration of the additionality	OK	OK
ii. Justification of key assumptions and rationales	EB 41	Ann 12	All indicators are from FSR, decision on approving invest, legislation By document checking, validation team can confirm all source data are correct	OK	OK
iii. Transparent illustration of all data used to determine the baseline scenario (variables, parameters, data sources etc)	EB 41	Ann 12	Yes	OK	OK
iv. Evidence that the incentive from the CDM was seriously considered in the decision to proceed with the project activity, if the starting date of	EB 41	Ann 12	By considering the definition indicated in the CDM Glossary of terms, the starting date is the date of EPC (Engineering, Procurement, Construction)	CAR-8	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
the project activity is before the date of validation			contract signed (10/09/2010). Thus, the starting date is prior to the date of validation.  CAR-8 was issued CAR-8: PDD version 1.0 stated that the starting date of the project activity is the signed date of the equipment contract (17 <sup>th</sup> Nov 2010). However, by checking provided documents, Validation team found the construction contract for the Project was signed on 10 <sup>th</sup> Sep 2010, prior to the equipment contract. Therefore, the signing date of equipment contract cannot be considered as starting date of the project activity		
p. In CDM-PDD section B.6.1 are following provided?	EB 41	Ann 12		OK	OK
i. Explanation as to how the procedures, in the approved methodology to calculate project emissions, baseline emissions, leakage emissions and emission reductions are applied to the proposed project activity	EB 41	Ann 12	Complying with ACM0002, the "Tool to calculate the emission factor for an electricity system", version 2.2.1 is used  Pending on close CAR-7	Pending	OK
ii. Equations used in calculating emission reductions	EB 41	Ann 12	Yes $ER_v = BE_v - PE_v - LE_v$	OK	OK
iii. Explanation and justification for all relevant methodological choices, including different scenarios or cases, options and default values	EB 41	Ann 12	Yes As per the ACM0002, version 12.2.0, leakage emission of this project is not considered. In the PDD, these emissions sources are neglected The steps and equations applied are consistent with the "Tool to calculate the emission factor for an electricity system", version 2.2.1 and ACM0002, version 12.2.0	OK	OK
q. In CDM-PDD section B.6.2 are following	EB	Ann		OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
provided?	41	12			
i. A compilation of information on the data and parameters that are not monitored throughout the crediting period but that are determined only once and thus remains fixed throughout the crediting period AND that are available when validation is undertaken	EB 41	Ann 12	Yes. Accordance with “Calculation emission factor of Vietnamese Electricity Grid”, the necessary official data of power grid published by DNA of Vietnam are available and determined during validation stage	OK	OK
ii. The actual value period	EB 41	Ann 12	Simple Operating Margin Emission Factor for the Vietnamese national electricity grid * $EF_{grid,OM\ simple,y} = 0.6465$ (tCO <sub>2</sub> /MWh) Build Margin Emission Factor for the Vietnamese national electricity grid * $EF_{grid,BM,y} = 0.5064$ (tCO <sub>2</sub> /MWh) Baseline Emission Factor for the Vietnamese national electricity grid * $EF_{grid,CM,y} = 0.5764$ (tCO <sub>2</sub> /MWh)  CAR-9 was issued CAR-9: In the PDD version 1.0, section B.6.2, the description of $EF_{grid,BM,y}$ and $EF_{grid,CM,y}$ are incorrect	CAR-9	OK
iii. Explanation and justification for the choice of the source of data	EB 41	Ann 12	The official data “Calculation emission factor of Vietnamese Electricity Grid” were based on the data of Reports of Power Plants in Vietnamese Power System in July 2009, Emission Factor of CO <sub>2</sub> pursuant to IPCC	OK	OK
iv. Clear and transparent references or additional documentation in Annex 3	EB 41	Ann 12	Yes	OK	OK
v. Where values have been measured, a description of the measurement methods and procedures (e.g. which standards have been used), indicated the responsible person/entity	EB 41	Ann 12	It is not applicable in this case as the emission factor is determined ex-ante as per the options in ACM0002	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
having undertaken the measurement, the date of measurement(s) and the measurement results					
r. In CDM-PDD section B.6.3 are following provided?	EB 41	Ann 12		OK	OK
i. A transparent <i>ex ante</i> calculation of project emissions, baseline emissions (or, where applicable, direct calculation of emission reductions) and leakage emissions expected during the crediting period, applying all relevant equations provided in the approved methodology	EB 41	Ann 12	Yes. The calculation process is in line with the steps taken prescribed in the “Calculation emission factor of Vietnamese Electricity Grid” and addressed in the section B.6.3 of the PDD and Annex 3	OK	OK
ii. Documentation how each equation is applied, in a manner that enables the reader to reproduce the calculation	EB 41	Ann 12	Yes The emission reductions calculation spreadsheet have been provided and checked by validation team	OK	OK
iii. Additional background information and or data in Annex 3, including relevant electronic files (i.e. spreadsheets)	EB 41	Ann 12	Yes	OK	OK
s. In CDM-PDD section B.6.4 are the results of the <i>ex ante</i> estimation of emission reductions for all years of the crediting period, provided in a tabular format?	EB 41	Ann 12	Yes. Data of emission reductions estimated from 01 <sup>st</sup> Jan 2013 to 31 <sup>st</sup> Dec 2019  CAR-10 was issued CAR-10: In the excel spread sheet, Emission reductions of the Project was calculated in the crediting period 2013 – 2020. However, in the PDD version 1.0, the crediting period is identified from December 2012 to November 2020. In the section B.6.4, specific date of year for emission reductions is required	CAR_10	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
t. In CDM-PDD section B.7.1 are following provided?	EB 41	Ann 12		OK	OK
i. Specific information on how the data and parameters that need to be monitored would actually be collected during monitoring for the project activity	EB 41	Ann 12	Yes. EG <sub>y,export</sub> : Electricity supplied by the proposed project to the national grid	OK	OK
ii. For each parameter the following below information, using the table provided:	EB 41	Ann 12			
a. The source(s) of data that will be actually used for the proposed project activity (e.g. which exact national statistics). Where several sources may be used, explain and justify which data sources should be preferred.	EB 41	Ann 12	Not applicable because no other outside sources of data should be used	-	-
b. Where data or parameters are supposed to be measured, specify the measurement methods and procedures, including a specification which accepted industry standards or national or international standards will be applied, which measurement equipment is used, how the measurement is undertaken, which calibration procedures are applied, what is the accuracy of the measurement method, who is the responsible person/entity that should undertake the measurements and what is the measurement interval; (i) A description of the QA/QC procedures (if any) that should be applied; (ii) Where relevant: any further comment. Provide any relevant further background	EB 41	Ann 12	Digital meters will be installed at the connecting point. Data from meters will be monthly recorded including electricity imported and exported.	OK	OK



CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
documentation in Annex 4.					
u. In CDM-PDD section B.7.2 are following provided?	EB 41	Ann 12		OK	OK
i. A detailed description of the monitoring plan	EB 41	Ann 12	Yes, a procedure for monitoring emission reduction was provided. In this, training, monitoring, reporting activities were described. Besides, responding plan for emergency cases were also addressed. Responsibilities were appropriately determined	OK	OK
ii. The operational and management structure that the project operator will implement in order to monitor emission reductions and any leakage effects generated by the project activity	EB 41	Ann 12	Yes. CDM monitoring responsibilities with clear positions, responsibilities and routines of report are sufficiently provided	OK	OK
iii. The responsibilities for and institutional arrangements for data collection and archiving	EB 41	Ann 12	Yes	OK	OK
iv. Indication that the monitoring plan reflect good monitoring practice appropriate to the type of project activity	EB 41	Ann 12	Information given in the PDD is sufficient that arrangements can be properly implemented. During interview, it was confirmed that procedures as described roughly in the PDD will be implemented.	OK	OK
v. Relevant further background information in Annex 4	EB 41	Ann 12	CAR-11 was issued  CAR-11: In the PDD version 1.0, accuracy class of meter system is not available as per requirements of Vietnamese Technical Standards	<del>CAR-11</del>	OK
v. In CDM-PDD section B.8 are following provided?	EB 41	Ann 12			
i. Date of completion of the application of the methodology to the project activity study in DD/MM/YYYY	EB 41	Ann 12	Date of completion of the baseline study was determined 15 <sup>th</sup> Jul 2011	OK	OK
ii. Contact information of the person(s)/entity(ies)	EB	Ann	Yes, VNEEC is responsible for the application	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
responsible for the application of the baseline and monitoring methodology to the project activity	41	12	VNEEC is also the project participant which is sufficiently addressed in Annex 1 of the PDD		
iii. Indication if the person/entity is also a project participant listed in Annex 1	EB 41	Ann 12	Yes	OK	OK
w. In CDM-PDD section C.1.1 are following provided?	EB 41	Ann 12		OK	OK
i. The starting date of a CDM project activity, which is the earliest of the date(s) on which the implementation or construction or real action of a project activity begins/has begun (EB33, Para 76/CDM Glossary of terms/EB47)	EB 41	Ann 12	Yes. The starting date is the actual date of EPC contract was signed  Pending on close CAR-8	Pending	OK
ii. A description of how this start date has been determined, and a description of the evidence available to support this start date	EB 41	Ann 12	By checking on – site and reviewing document, validation team confirms that the starting date was properly chosen	OK	OK
iii. If this starting date is earlier than the date of publication of the CDM-PDD for global stakeholder consultation by a DOE, description in Section B.5 contain a of how the benefits of the CDM were seriously considered prior to the starting date (EB41, Para 68).	EB 41	Ann 12	Yes. Management board of project owner considered the benefits of CDM then held a meeting with CDM consultant. Thus, a decision for developing the Project as CDM project was made on 24 <sup>th</sup> June 2010 (prior to date of publication of PDD – 11 <sup>th</sup> May 2011) By document checking and interviewing, BV validation team confirm that the evidences substantiated appropriately the CDM consideration <a href="http://cdm.unfccc.int/Projects/Validation/DB/WR0MO4FXSAX6NUTIZZVRCMTLUVO39O/view.html">http://cdm.unfccc.int/Projects/Validation/DB/WR0MO4FXSAX6NUTIZZVRCMTLUVO39O/view.html</a>	OK	OK
x. In CDM-PDD section C.1.2 is the expected operational lifetime of the project activity in years and months provided?	EB 41	Ann 12	Yes. Operational lifetime of the Project is expected in 37 years	CAR-12	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
			<p>CAR-12 was issued</p> <p>CAR-12: In the PDD version 1.0, section C.1.2, the source to substantiate the expected operational lifetime of the Project is not available</p>		

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
y. In CDM-PDD section C.2 is it stated whether the project activity will use a renewable or a fixed crediting period and is C.2.1 or C.2.2 completed accordingly?	EB 41	Ann 12	Yes Renewable crediting period will be applied	OK	OK
z. In CDM-PDD section C.2.1 is it indicated that each crediting period shall be at most 7 years and may be renewed at most two times, provided that, for each renewal, a designated operational entity determines and informs the Executive Board that the original project baseline is still valid or has been updated taking account of new data where applicable?	EB 41	Ann 12	Yes. 07 years 0 month	OK	OK
aa. In CDM-PDD section C.2.1.1 are dates in the following format: (DD/MM/YYYY) provided?	EB 41	Ann 12	Yes. 01/01/2013  CAR-13 was issued  CAR-13: In the PDD version 1.0, section C.2.1.1, the starting date of the first crediting period is required to add the information of registration date	<del>CAR-13</del>	OK
bb. In CDM-PDD section C.2.1.2 is the length of the first crediting period in years and months provided?	EB 41	Ann 12	Yes. 07 years 0 month	OK	OK
cc. In CDM-PDD section C.2.2 is the fixed crediting period at most ten (10) years provided?	EB 41	Ann 12	Not applicable	-	-
dd. In CDM-PDD section C.2.2.1 are the dates provided in the following format: (DD/MM/YYYY)?	EB 41	Ann 12	Not applicable	-	-
ee. In CDM-PDD section C.2.2.2 is the length of the crediting period in years and months Provided?	EB 41	Ann 12	Not applicable	-	-
ff. In CDM-PDD section D.2 are the conclusions and all references to support documentation of an	EB 41	Ann 12	Yes The conclusion stated.	OK	OK

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environmental impact assessment undertaken in accordance with the procedures as required by the Host Party, if environmental impacts are considered significant by the project participants or the Host, provided?			The support documents have been provided during desk review assessment		
gg. In CDM-PDD section E.1 are the following provided?	EB 41	Ann 12		OK	OK
i. The process by which comments by local stakeholders have been invited and compiled. An invitation for comments by local stakeholders shall be made in an open and transparent manner, in a way that facilitates comments to be received from local stakeholders and allows for a reasonable time for comments to be submitted.	EB 41	Ann 12	Yes. Representatives of local People Committees, local people in the affected areas were interviewed to join the meeting in order to consult and comment on the proposed project from 16 <sup>th</sup> Oct to 22 <sup>nd</sup> Oct 2009 CL-3 was issued CL-3: In section E.1, PDD version 1.0 stated that "On 16th, 20th and 22nd of October 2009, a meeting between the project owner and the following representatives of the local people was held in order to consult local people on the social-economic and environment impacts of the proposed project in order to develop this project as a CDM activity". However, no substantiation of how the invitation was done	<del>CL-3</del>	OK
ii. The project activity is described in a manner, which allows the local stakeholders to understand the project activity, taking into account confidentiality provisions of the CDM modalities and procedures.	EB 41	Ann 12	Yes By collecting comments from local authorities and people	OK	OK
iii. The local stakeholder process has been completed before submitting the proposed project activity to the DOE for validation.	EB 41	Ann 12	Yes. Completed in 22 <sup>nd</sup> Oct 2009	OK	OK

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hh. In CDM-PDD section E.2 are following provided?	EB 41	Ann 12		OK	OK
i. Identification of local stakeholders that have made comments	EB 41	Ann 12	Yes. Local people organized internal meeting and comments on proposed project	OK	OK
ii. A summary of this comments.	EB 41	Ann 12	Please see the demonstration in the PDD, section E.2	OK	OK
ii. In CDM-PDD section E.3 is the explanation of how due account have been taken of comments received from local stakeholders provided?	EB 41	Ann 12	Yes. The local stakeholders are all supportive of the proposed project. Hence, it is unnecessary to modify the project design according to comments received	OK	OK
jj. In CDM-PDD Annex 1 are the following provided?	EB 41	Ann 12		OK	OK
i. Contact information of project participants	EB 41	Ann 12	Yes	OK	OK
ii. For each organisation listed in section A.3 the following mandatory fields: Organization, Name of contact person, Street, City, Postfix/ZIP, Country, Telephone and Fax or e-mail	EB 41	Ann 12	Yes	OK	OK
kk. In CDM-PDD Annex 2 is information from Parties included in Annex I on sources of public funding for the project activity which shall provide an affirmation that such funding does not result in a diversion of official development assistance and is separate from and is not counted towards the financial obligations of those Parties provided?	EB 41	Ann 12	Yes No public funding from Annex I parties is involved in the proposed project activity	OK	OK
ll. In CDM-PDD Annex 3 is the background information used in the application of the baseline methodology provided?	EB 41	Ann 12	Yes	OK	OK
mm. In CDM-PDD Annex 4 is the background	EB	Ann	Yes	OK	OK

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information used in the application of the monitoring methodology provided?	41	12	Pending on close CAR-11 CL-7 was issued CL-7: By interviewing the Project owner, the Project will connect to National grid via 22kV line for internal use, parallel with transmission line and diesel generator will be installed for emergency cases. But no information provided in the PDD version 1.0	Pending	
<b>4. Project description</b>					
a. Does the PDD contain a clear description of the project activity that provides the reader with a clear understanding of the precise nature of the project activity and the technical aspects of its implementation?	VVM	58	Yes	OK	OK
b. Is the description of the proposed CDM project activity as contained in the PDD:	VVM	59		OK	OK
i. sufficiently covering all relevant elements?	VVM	59	Yes	OK	OK
ii. accurate?	VVM	59	Yes	OK	OK
iii. providing the reader with a clear understanding of the nature of the proposed CDM project activity?	VVM	59	Yes	OK	OK
iv. Are there any changes/modifications compared to the webhosted PDD?	VVM	59	There is no change or modifications compared with web hosted PDD, version 1.0	OK	OK
c. Is the proposed CDM project activity in existing facilities or or utilizing existing equipments?	VVM	60	No. The project is a newly built hydro electric power plant	OK	OK
d. Is the CDM project activity one of the following types:	VVM	60		OK	OK
i. Large scale?	VVM	60	Yes. The installed capacity of the Project is 29 MW	OK	OK



CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
ii. Non-bundled small scale projects with emission reductions exceeding 15,000 tonnes per year?	VVM	60	No	OK	OK
iii. Bundled small scale projects, each with emission reductions not exceeding 15,000 tonnes?	VVM	60	No	OK	OK
e. If yes to (c) and (d) above, was a physical site inspection conducted to confirm that the description in the PDD reflects the proposed CDM project activity, unless other means are specified in the methodology?	VVM	60	Yes. The site – visit was conducted by BV validation team on 29 <sup>th</sup> May 2011	OK	OK
f. If yes to (d.iii) above, was the number of physical site visits base on sampling?	VVM	60	Not applicable	-	-
g. If yes is the sampling size appropriately justified through statistical analysis?	VVM	60	Not applicable	-	-
h. For other individual proposed small scale CDM project activities with emission reductions not exceeding 15,000 tonnes per year, was a physical site inspection conducted?	VVM	61	Not applicable	-	-
i. For all other proposed CDM project activities not referred to in paragraphs 59 – 61, was a physical site inspection conducted?	VVM	62	Not applicable	-	-
j. If no, was it appropriately justified?	VVM	62	Not applicable	-	-
k. Does the proposed CDM project activity involve the alteration of an existing installation or process?	VVM	63	No	OK	OK
l. If yes, does the project description clearly state the differences resulting from the project activity compared to the pre-project situation?	VVM	63	Not applicable	-	-
<b>5. Baseline and monitoring methodology</b>					
<b>a. General requirement</b>					

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
a. Do the the baseline and monitoring methodologies selected by the project participants comply with the methodologies previously approved by the CDM Executive Board?	VVM	65	Yes	OK	OK
b. Is the selected methodology applicable to the project activity?	VVM	66	Refer to (5.b.a) below	-	-
c. Had the PP correctly applied the selected methodology?	VVM	66	Refer to (5.b.d) below	-	-
d. Had the selected methodology been correctly applied with respect to project boundary?	VVM	67	Refer to (5.c) below	-	-
e. Had the selected methodology been correctly applied with respect to baseline identification?	VVM	67	Refer to (5.d) below	-	-
f. Had the selected methodology been correctly applied with respect to Algorithms and/or formulae used to determine emission reductions?	VVM	67	Refer to (5.e) below	-	-
g. Had the selected methodology been correctly applied with respect to additionality?	VVM	67		OK	OK
i. Has the additionality of the project activity been demonstrated and assessed using the latest version of the “Tool for the demonstration and assessment of additionality” agreed by the Board, which is available on the UNFCCC website?	ACM	0002 v.12.2 .0	Yes, the latest version was correctly applied (version 06.0, 25 <sup>th</sup> Nov 2011) in the PDD	OK	OK
h. Had the selected methodology been correctly applied with respect to monitoring methodology?	VVM	67	Refer to (7.g), (7.h), (7.i), (7.j) and (7.k) below		
<b><i>b. Applicability of the selected methodology to the project activity</i></b>					
a. Is the selected baseline and monitoring methodology, previously approved by the CDM	VVM	68		OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
Executive Board, applicable to the project activity? Is the used version valid?					
i. This methodology is applicable to grid-connected renewable power generation project activities that (a) install a new power plant at a site where no renewable power plant was operated prior to the implementation of the project activity (greenfield plants); (b) involve a capacity addition; (c) involve a retrofit of (an) existing plant(s); or (d) involve a replacement of (an) existing plant(s).	ACM	0002 v.12.2 .0	Yes. The project is a Greenfield plant	OK	OK
b. Has the DOE applied specific guidance provided by the CDM Executive Board in respect to the applicable approved methodology?	VVM	69	Yes	OK	OK
c. Is the methodology correctly quoted?	VVM	70	Yes. In the PDD, the applied methodology is ACM0002, "Consolidated baseline methodology for grid – connected electricity generation from renewable sources", version 12.2.0.	OK	OK
d. Are the applicability conditions of the methodology met?	VVM	71		OK	OK
i. The project activity is the installation, capacity addition, retrofit or replacement of a power plant/unit of one of the following types: hydro power plant/unit (either with a run-of-river reservoir or an accumulation reservoir), wind power plant/unit, geothermal power plant/unit, solar power plant/unit, wave power plant/unit or tidal power plant/unit	ACM	0002 v.12.2 .0	Yes. The Project is a new installation of a hydropower plant	-	-
ii. In the case of capacity additions, retrofits or replacements (except for wind, solar, wave or tidal power capacity addition projects which	ACM	0002 v.12.2 .0	Not applicable	-	-

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use Option 2: on page 10 to calculate the parameter $EG_{PJ,y}$ ): the existing plant started commercial operation prior to the start of a minimum historical reference period of five years, used for the calculation of baseline emissions and defined in the baseline emission section, and no capacity expansion or retrofit of the plant has been undertaken between the start of this minimum historical reference period and the implementation of the project activity.					
iii. In case of hydro power plants, one of the following conditions must apply: <ul style="list-style-type: none"> <li>- The project activity is implemented in an existing reservoir, with no change in the volume of reservoir; or</li> <li>- The project activity is implemented in an existing reservoir, where the volume of reservoir is increased and the power density of the project activity, as per definitions given in the Project Emissions section, is greater than 4 W/m<sup>2</sup>; or</li> <li>- The project activity results in new reservoirs and the power density of the power plant, as per definitions given in the Project Emissions section, is greater than 4 W/m<sup>2</sup>.</li> </ul>	ACM	0002 v.12.2 .0	The project activity results a new reservoir with a power density of greater than 4 W/m <sup>2</sup> . It could be confirmed by checking the reservoir design and the expected installed capacity	OK	OK
iv. The methodology is not applicable to the following conditions. Please confirm <ul style="list-style-type: none"> <li>- Project activities that involve switching from fossil fuels to renewable energy sources at the site of the project activity</li> </ul>	ACM	0002 v.12.2 .0	Project activity is a new installation of new hydro power plant. Thus, it does not involve switching from fossil fuels to renewable energy sources at the site; not switching from biomass fired power plants and the power density of power plant is	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
- Biomass fired power plants; - Hydro power plants that result in new reservoirs or in the increase in existing reservoirs where the power density of the power plant is less than 4 W/m <sup>2</sup> .			higher than 4 W/m <sup>2</sup> as checked		
v. In the case of retrofits, replacements, or capacity additions, this methodology is only applicable if the most plausible baseline scenario, as a result of the identification of baseline scenario, is “the continuation of the current situation, i.e. to use the power generation equipment that was already in use prior to the implementation of the project activity and undertaking business as usual maintenance”.	ACM	0002 v.12.2 .0	Not applicable	-	-
e. Is the project activity expected to result in emissions other than those allowed by the methodology?	VVM	71	No. Only CO <sub>2</sub> is considered as emission	OK	OK
f. Is the choice of the methodology justified?	VVM	71	Yes. Justification and explanation provided sufficiently in the PDD	OK	OK
g. Have the project participants shown that the project activity meets each of the applicability conditions or the approved methodology?	VVM	71	Refer to (5.b.d) above	-	-
h. Have the project participants shown that the project activity meets each of the applicability conditions of any tool or other methodology component referred to the methodology?	VVM	71		OK	OK
i. Are each of the applicability conditions of the “Tool to calculate the emission factor for an electricity system” met?	EB 50	Ann 40	Yes. Complying with ACM0002, the “Tool to calculate the emission factor for an electricity system”, version 2.2.1 is used	OK	OK
ii. Are each of the applicability conditions of the	EB	Ann	Yes. “Tool for the demonstration and assessment	OK	OK

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	"Tool for the demonstration and assessment of additionality" met?	39	10	of additionality", version 06.0 is used		
iii.	Are each of the applicability conditions of the "Combined tool to identify the baseline scenario and demonstrate additionality" met?	EB 28	Ann 14	Not applicable	-	-
iv.	Are each of the applicability conditions of the "Tool to calculate project or leakage CO <sub>2</sub> emissions from fossil fuel combustion" met?	EB 41	Ann 11	Yes. "Tool to calculate project or leakage CO <sub>2</sub> emissions from fossil fuel combustion", version 2 is used	OK	OK
i.	Is the DOE, based on local and sectoral knowledge, aware that comparable information is available from sources other than that used in the PDD?	VVM	71	Yes	OK	OK
j.	If yes, was the PDD cross checked against the other sources to confirm that the project activity meets the applicability conditions of the methodology? (provide the reference to these choices)	VVM	71	Yes	OK	OK
k.	Can a determination regarding the applicability of the selected methodology to the proposed CDM project activity be made?	VVM	72	Yes	OK	OK
l.	If no, clarification of the methodology was requested, in accordance with the guidance provided by the CDM Executive Board?	VVM	72	Not applicable	-	-
m.	If answer to (5.b.d) above is "no", revision or deviation from the methodology was requested, in accordance with the guidance provided by the CDM Executive Board?	VVM	73	Not applicable	-	-
n.	If yes to (5.b.l) and (5.b.m) above, a request for registration was submitted before the CDM Executive Board has approved the proposed deviation or revision?	VVM	74	Not applicable	-	-

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<b>c. Project boundary</b>					
a. Does the PDD correctly describe the project boundary, including the physical delineation of the proposed CDM project activity included within the project boundary for the purpose of calculating project and baseline emissions for the proposed CDM project activity?	VVM	78		OK	OK
i. Does the extent of the project boundary, as described in the PDD, includes the project power plant and all power plants connected physically to the electricity system that the CDM project power plant is connected to?	ACM	0002 v.12.2 .0	Yes The project boundary includes water retaining structure with auxiliary facilities; power house with auxiliary facilities and the grid into which the electricity will be connected	OK	OK
ii. Are the greenhouse gases and emission sources that are included in or excluded from the project boundary shown in a table format as per applicable methodology?	ACM	0002 v.12.2 .0	Yes. Only emission of CO <sub>2</sub> is considered A table in section B.3 was provided properly	OK	OK
b. Is the delineation in the PDD of the project boundary correct and include identification of all locations, processes and equipment including secondary equipment and associated processes such as logistics etc.?	VVM	79	Yes	OK	OK
c. Does the delineation in the PDD of the project boundary meet the requirements of the selected baseline?	VVM	79	Yes	OK	OK
d. Have changes been made to the project boundary in comparison to the webhosted PDD. If yes please comment on the reason for the changes.	VVM	79	There is no change or modifications compared with web hosted PDD, version 1.0	OK	OK
e. Have all sources and GHGs required by the methodology been included within the project	VVM	79	Yes	OK	OK



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boundary?					
f. Does the methodology allow project participant to choose whether a source or gas is to be included within the project boundary	VVM	79	Yes. For hydropower plant, CH <sub>4</sub> can be included as gas. However, because of power density of the reservoir is greater than 10 W/m <sup>2</sup> . CH <sub>4</sub> is neglected	OK	OK
g. If yes, have the project participants justified that choice?	VVM	79	Yes	OK	OK
h. If yes, is the justification provided reasonable? (provide reference to the supporting documented evidence provided by the project participants)	VVM	79	Yes	OK	OK
<b>d. Baseline identification</b>					
a. Does the PDD identify the baseline for the proposed CDM project activity, defined as the scenario that reasonably represents the anthropogenic emissions by sources of GHGs that would occur in the absence of the proposed CDM project activity?	VVM	81	Yes. The baseline scenario was clearly identified in the section B.4 of the PDD in accordance with ACM0002, version 12.2.0 that “Electricity delivered to the Grid by the Project would have otherwise been generated by the operation of grid – connected power plants and by the addition of new generation sources”	OK	OK
b. Has any procedure contained in the methodology to identify the most reasonable baseline scenario, been correctly applied?	VVM	82		OK	OK
i. If the project activity is the install a new grid-connected renewable power plant/unit (greenfield plant), is the baseline scenario identified appropriately in accordance with the ACM0002 ver.12.2.0?	ACM	0002 v.12.2 .0	Yes. As per methodology ACM0002, version 12.2.0, the baseline scenario is prescribed and no further analysis required. Thus, there is no need to take steps to identify the baseline scenarios	OK	OK
ii. If the project activity is a capacity addition to existing grid-connected renewable power plant/unit, is the baseline scenario identified	ACM	0002 v.12.2 .0	Not applicable	-	-

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appropriately in accordance with the ACM0002 ver. 12.2.0? And is the point of time at which the generation facility would likely be replaced or retrofitted (DATE Baseline Retrofit) reasonably defined?					
iii. If the project activity is the retrofit or replacement of existing grid-connected renewable power plant/unit, is the baseline scenario identified following the step-wise procedure in accordance with the ACM0002 ver.12.2.0?	ACM	0002 v.12.2 .0	Not applicable	-	-
iv. Are the realistic and credible alternative baseline scenarios for power generation appropriately identified following the Step 1 of the “Combined tool to identify the baseline scenario and demonstrate additionality”? (Step 1)	ACM	0002 v.12.2 .0	Yes. Alternative identified accordingly with step 1 of “Combined tool to identify the baseline scenario and demonstrate additionality”	-	-
v. Are the realistic and credible alternative baseline scenarios i.e. P1, P2 and P3 appropriately applied <b>Barrier analysis</b> following the Step 2 of the “Combined tool to identify the baseline scenario and demonstrate additionality”? (Step 2)	ACM	0002 v.12.2 .0	Not applicable	-	-
vi. If more than one alternative is remaining after Step 2, is <b>Investment analysis</b> appropriately applied (apply an Investment Comparison as per step 3 of the “Combined tool to identify the baseline scenario and demonstrate additionality” or a Benchmark Analysis as per step 2b of the “Tool for the demonstration and assessment of additionality”)? (Step 3)	ACM	0002 v.12.2 .0	Yes. Investment analysis is applied	OK	OK

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c. Does the selected methodology require use of tools (such as the “Tool for the demonstration and assessment of additionality” and the “Combined tool to identify the baseline scenario and demonstrate additionality”) to establish the baseline scenario?	VVM	82	Yes, selected methodology require to use “Tool for the demonstration and assessment of additionality” was used in accordance with ACM0002, ver.12.2.0	OK	OK
d. If yes, was the methodology consulted on the application of these tools? (In such cases, the guidance in the methodology shall supersede the tool.)	VVM	82	Yes. Pursuant to ACM0002, v.12.2.0, the additionality of the Project shall be demonstrated and assessed using the latest version of the “Tool for the demonstration and assessment of additionality”	OK	OK
e. Does the methodology require several alternative scenarios to be considered in the identification of the most reasonable baseline scenario?	VVM	83	Yes	OK	OK
f. If yes, are all scenarios that are considered by the project participants and are supplementary to those required by the methodology reasonable in the context of the proposed CDM project activity?	VVM	83	Yes. 2 alternatives are identified sufficiently based on ACM0002, v.12.2.0	OK	OK
g. Has any reasonable alternative scenario been excluded?	VVM	83	No	OK	OK
h. Is the baseline scenario identified reasonably supported by:	VVM	84		OK	OK
i. Assumptions?	VVM	84	No. All evidences to identify baseline scenario are clearly for the determination of validation team	OK	OK
ii. Calculations?	VVM	84	No. All evidences to identify baseline scenario are clearly for the determination of validation team	OK	OK
iii. Rationales?	VVM	84	No. All evidences to identify baseline scenario are clearly for the determination of validation team	OK	OK
i. Are the documents and sources referred to in the PDD correctly quoted and interpreted?	VVM	84	Yes.	OK	OK
j. Was the information provided in the PDD cross	VVM	84	Yes. All document and source links provided were	OK	OK

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checked with other verifiable and credible sources, such as local expert opinion, if available? (identify the sources)			sufficiently checked by validation team and confirmed		
k. Have all applicable CDM requirements been taken into account in the identification of the baseline scenario for the proposed CDM project activity?	VVM	85	Yes	OK	OK
l. Have all relevant policies and circumstances been identified and correctly considered in the PDD, in accordance with the guidance by the CDM Executive Board?	VVM	85	Yes	OK	OK
m. Does the PDD provide a verifiable description of the identified baseline scenario, including a description of the technology that would be employed and/or the activities that would take place in the absence of the proposed CDM project activity?	VVM	86	Yes	OK	OK
<b><i>e. Algorithms and/or formulae used to determine emission reductions</i></b>					
a. Do the steps taken and equations applied to calculate project emissions, baseline emissions, leakage and emission reductions comply with the requirements of the selected baseline and monitoring?	VVM	89	Yes	OK	OK
b. Have the equations and parameters in the PDD been correctly applied with respect to those in the selected approved methodology?	VVM	90		OK	OK
i. Are the Project emissions appropriately calculated?	ACM	0002 v.12.2 .0	Yes. The project emission is determined as zero per the ACM0002, version 12.2.0	OK	OK

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ii. Are the Baseline emissions appropriately calculated specifically for (a) greenfield plants or (b) retrofit and replacements or (c) capacity additions?	ACM	0002 v.12.2 .0	Yes. For Greenfield plants	OK	OK
iii. Are the Leakage appropriately calculated?	ACM	0002 v.12.2 .0	Yes As per the ACM0002, version 12.2.0, leakage emission of this project is not considered. In the PDD, these emissions sources are neglected	OK	OK
iv. Are the Emission reductions appropriately calculated?	ACM	0002 v.12.2 .0	Yes $ER_y = BE_y - PE_y - LE_y$	OK	OK
c. Have project participants prepared as part of the CDM-PDD an estimate of likely emission reductions for the proposed crediting period? This estimate should, in principle, employ the same methodology as selected for the calculation of emission reductions. Where the grid emission factor (EFCM,grid,y) is determined ex post during monitoring, project participants may use models or other tools to estimate the emission reductions prior to validation.	ACM	0002 v.12.2 .0	Yes. Approximate emission reductions (from year 01 <sup>st</sup> Jan 2013 to year 31 <sup>st</sup> Dec 2019) are provided. Annual emission reductions of 130,776 tonnes CO <sub>2</sub> e are estimated for the first crediting period  Pending on close CAR-10	Pending	OK
d. Does the methodology provide for selection between different options for equations or parameters?	VVM	90	Yes. Options in Step 1, step 2 and step 3 in the methodology were used	OK	OK
e. If yes, has adequate justification been provided (based on the choice of the baseline scenario, context of the proposed CDM project activity and other evidence provided)?	VVM	90	Yes. Relevant justifications in step 1, step 2 and step 3	OK	OK
f. If yes, have correct equations and parameters been used, in accordance with the methodology selected?	VVM	90	Refer to (5.e.b) above	-	-

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g. Will data and parameters be monitored throughout the crediting period of the proposed CDM project activity?	VVM	91	Yes. Via validating the monitoring plan, relevant procedures, validation team confirm that parameters and data will be properly monitored by responsible persons of the Project	OK	OK
h. If no, and these data and parameters will remain fixed throughout the crediting period, are all data sources and assumptions:	VVM	91		OK	OK
i. Appropriate and correct?	VVM	91	Not applicable	-	-
ii. Applicable to the proposed CDM project activity?	VVM	91	Not applicable	-	-
iii. Resulting in a conservative estimate of the emission reductions?	VVM	91	Not applicable	-	-
i. Will data and parameters be monitored on implementation and hence become available only after validation of the project activity?	VVM	91	Yes. Because at the time of validation stage, the Project has not commissioned yet.	OK	OK
j. If yes, are the estimates provided in the PDD for these data and parameters reasonable?	VVM	91	Yes. Estimated data are sufficiently provided in the PDD	OK	OK
<b>6. Additionality of a project activity</b>					
a. Does the PDD describe how a proposed CDM project activity is additional?	VVM	94	Yes	OK	OK
b. Does the CDM-PDD state the latest version of the additionality tool being used?	ACM	0002 v.12.2 .0	Yes, the latest version of the additionality tool was addressed in the PDD for utilizing. Version 6.0 of "Tool for the demonstration and assessment the additionality"	OK	OK
c. Were the following steps of the tool to assess additionality used:	EB 39	Ann 10		OK	OK
i. Identification of alternatives to the project activity?	EB 39	Ann 10	Yes	OK	OK

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ii. Investment analysis to determine that the proposed project activity is either: 1) not the most economically or financially attractive, or 2) not economically or financially feasible?	EB 39	Ann 10	Yes	OK	OK
iii. Barriers analysis?	EB 39	Ann 10	No	OK	OK
iv. Common practice analysis?	EB 39	Ann 10	Yes	OK	OK
d. In step 1 (i) have all the sub-steps as below been followed?	EB 39	Ann 10		OK	OK
i. Sub-step 1a: Define alternatives to the project activity	EB 39	Ann 10	Yes Alternative 1: the proposed project will be undertaken without CDM registration Alternative 2: Continuation of current situation is alternative of the Project	OK	OK
ii. Sub-step 1b: Consistency with mandatory laws and regulations	EB 39	Ann 10	Yes All 2 alternatives are consistent with mandatory laws and regulations  By checking Vietnamese and Local laws and regulations, Validation team confirm that the Project activity (without CDM registration) complies with Laws and regulations	OK	OK
e. Have the following alternatives been included while defining alternatives as per sub-step 1a?	EB 39	Ann 10		OK	OK
i. (a) The proposed project activity undertaken without being registered as a CDM project activity;	EB 39	Ann 10	Yes, alternative 1	OK	OK
ii. (b) Other realistic and credible alternative scenario(s) to the proposed CDM project activity scenario that deliver outputs services or	EB 39	Ann 10	No	OK	OK

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services with comparable quality, properties and application areas, taking into account, where relevant, examples of scenarios identified in the underlying methodology;					
iii. (c) If applicable, continuation of the current situation (no project activity or other alternatives undertaken).	EB 39	Ann 10	Yes, alternative 2	OK	OK
f. Has the project participant included the technologies or practices that provide outputs or services with comparable quality, properties and application areas as the proposed CDM project activity and that have been implemented previously or are currently being introduced in the relevant country/region?	EB 39	Ann 10	Yes	OK	OK
g. Has the outcome of Step 1a: Identified realistic and credible alternative scenario(s) to the project activity done correctly? Please briefly mention the outcome.	EB 39	Ann 10	Yes. Alternative 1: The proposed project undertaken without the CDM Alternative 2: Continuation of the current situation. Pursuant to ACM0002, version 12.2.0, validation team confirm that alternatives are correctly identified	OK	OK
h. Is the alternative(s) in compliance with all mandatory applicable legal and regulatory requirements, even if these laws and regulations have objectives other than GHG reductions, e.g. to mitigate local air pollution.?	EB 39	Ann 10	All alternatives are compliance with all mandatory applicable legal and regulatory requirements for electricity generation in Vietnam. Thus, the realistic alternative is definitely compliance	OK	OK
i. If an alternative does not comply with all mandatory applicable legislation and regulations, has it been shown that, based on an examination of current practice in the country or region in which the law or regulation applies, those	EB 39	Ann 10	Because all alternatives are compliance as mentioned above. Thus, this section is no applicable	-	-



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applicable legal or regulatory requirements are systematically not enforced and that noncompliance with those requirements is widespread in the country?					
j. Has the outcome of Step 1b: Identified realistic and credible alternative scenario(s) to the project activity that are in compliance with mandatory legislation and regulations taking into account the enforcement in the region or country and EB decisions on national and/or sectoral policies and regulations done correctly? Please state the outcome.	EB 39	Ann 10	2 alternatives are all consistent with laws in Vietnam By checking investment license of the project, validation team can confirm.	OK	OK
k. Has PP selected Step 2 (Investment analysis) or Step 3 (Barrier analysis) or both Steps 2 and 3?	EB 39	Ann 10	Project Participants have already selected step 2 only	OK	OK
l. In step 2, have all the sub-steps as below been followed?	EB 39	Ann 10		OK	OK
i. Sub-step 2a: Determine appropriate analysis method;	EB 39	Ann 10	Yes	OK	OK
ii. Sub-step 2b: Option I. Apply simple cost analysis;	EB 39	Ann 10	Because the proposed project activity will receive revenue from the sale of electricity thus simple cost analysis would not be considered  CL-4 was issued CL-4: No supporting information to justify that the option I of Investment analysis (Simple cost analysis) is not applicable	CL-4	OK
iii. Sub-step 2b: Option II. Apply investment comparison analysis;	EB 39	Ann 10	Because the alternative is receiving electricity from the national grid rather than new project, thus option III, benchmark analysis were selected	OK	OK
iv. Sub-step 2b: Option III. Apply benchmark analysis;	EB 39	Ann 10	Because the alternative is receiving electricity from the national grid rather than new project, thus	OK	OK

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			option III, benchmark analysis were selected		

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v. Sub-step 2c: Calculation and comparison of financial indicators (only applicable to Options II and III);	EB 39	Ann 10	Yes	OK	OK
vi. Sub-step 2d: Sensitivity analysis (only applicable to Options II and III).	EB 39	Ann 10	Yes	OK	OK
m. In sub-step 2a has the determination of appropriate method of analysis done as per the guidance as below?	EB 39	Ann 10		OK	OK
i. Simple cost analysis if the CDM project activity and the alternatives identified in Step 1 generate no financial or economic benefits other than CDM related income (Option I).	EB 39	Ann 10	Not applicable	-	-
ii. Otherwise, use the investment comparison analysis (Option II) or the benchmark analysis (Option III). Specify option used with justification.	EB 39	Ann 10	Because the alternative is receiving electricity from the national grid rather than new project, thus option III, benchmark analysis were selected	OK	OK
n. Has the below guideline followed for sub-step 2b Option I. Apply simple cost analysis? Document the costs associated with the CDM project activity and the alternatives identified in Step1 and demonstrate that there is at least one alternative which is less costly than the project activity.	EB 39	Ann 10	Because the option III was chosen, this section is not applicable	-	-
o. Has the below guideline followed for sub-step 2b Option II. Apply investment comparison analysis? Identify the financial indicator, such as IRR, NPV, cost benefit ratio, or unit cost of service most suitable for the project type and decision-making context. Please specify	EB 39	Ann 10	Because the option III was chosen, this section is not applicable	-	-
p. Has the below guideline followed for Sub-step 2b: Option III. Apply benchmark analysis?	EB 39	Ann 10		OK	OK
i. Identify the financial/economic indicator, such	EB	Ann	The project developer selected the Local Lending	OK	OK

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as IRR, most suitable for the project type and decision context.	39	10	Rate as a benchmark for this project IRR pursuant to “Guidelines on Assessment of Investment Analysis” version 5, Annex 05, EB 62		
ii. When applying Option II or Option III, the financial/economic analysis shall be based on parameters that are standard in the market, considering the specific characteristics of the project type, but not linked to the subjective profitability expectation or risk profile of a particular project developer. Only in the particular case where the project activity can be implemented by the project participant, the specific financial/economic situation of the company undertaking the project activity can be considered.	EB 39	Ann 10	Yes	OK	OK
iii. Discount rates and benchmarks shall be derived from: (a) Government bond rates, increased by a suitable risk premium to reflect private investment and/or the project type, as substantiated by an independent (financial) expert or documented by official publicly available financial data; (b) Estimates of the cost of financing and required return on capital (e.g. commercial lending rates and guarantees required for the country and the type of project activity concerned), based on bankers views and private equity investors/funds’ required return on comparable projects; (c) A company internal benchmark (weighted average capital cost of the company), only in the particular case referred to above in 2. The project developers	EB 39	Ann 10	Yes. Local Lending rates is appropriately selected and applied for the investment analysis (accordingly with decision making the project developer) Average industry equity ration was defined 30%, consistently with Vietnamese conditions By checking document, relevant records and cross – checking with information at the time of decision making, validation team confirm that all data are correctly applied	OK	OK

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shall demonstrate that this benchmark has been consistently used in the past, i.e. that project activities under similar conditions developed by the same company used the same benchmark; (d) Government/official approved benchmark where such benchmarks are used for investment decisions; (e) Any other indicators, if the project participants can demonstrate that the above Options are not applicable and their indicator is appropriately justified. Please specify benchmark and justify.					
q. Has the below guideline followed for Sub-step 2c: Calculation and comparison of financial indicators (only applicable to Options II and III)?	EB 39	Ann 10			
i. Calculate the suitable financial indicator for the proposed CDM project activity and, in the case of Option II above, for the other alternatives. Include all relevant costs (including, for example, the investment cost, the operations and maintenance costs), and revenues (excluding CER revenues, but possibly including inter alia subsidies/fiscal incentives, ODA, etc, where applicable), and, as appropriate, non-market cost and benefits in the case of public investors if this is standard practice for the selection of public investments in the host country.	EB 39	Ann 10	<p>Yes.</p> <p>CAR-14, CAR-15, CAR-16, CAR-17, CAR-18, CAR-19 were issued</p> <p>CAR-14: In the PDD version 1.0, the benchmark is 13.6%. However, in the excel spread sheet, the benchmark was calculated as 13.5%</p> <p>CAR-15: In the PDD version 1.0, the expected operational lifetime of the Project is identified as 37 years. However, in the excel spread sheet, the Project IRR only calculated in 36 years</p> <p>CAR-16: In the investment analysis, table 5 in the PDD version 1.0, sources for "Gross Capacity", "Total investment cost", "Construction period" and "Electricity price" are not clear and</p>	CAR-14 CAR-15 CAR-16 CAR-17 CAR-18 CAR-19	OK

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			<p>accessible</p> <p>CAR-17: In the excel spread sheet, the depreciation time of equipment and constructions is applied according to Decision 206/2003/QD-BTC. However, by checking local regulation, Validation team found that this Decision was expired from 01<sup>st</sup> Jan 2010, prior to Decision making date (24<sup>th</sup> June 2010)</p> <p>CAR-18: In the PDD version 1.0, in the investment analysis, the resources tax is applied pursuant to Circular 42/2007/TT-BTC. However, by checking local regulation, Validation team found that this Circular was expired from 01<sup>st</sup> Aug 2008, prior to Decision making date (24<sup>th</sup> June 2010)</p> <p>CAR-19: In the investment analysis of PDD version 1.0, the income tax is applied according to Government Decision 124/2008/ND-CP. However, Validation team found that this document is a Decree, issued by Vietnamese Government</p>		

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ii. Present the investment analysis in a transparent manner and provide all the relevant assumptions, preferably in the CDM-PDD, or in separate annexes to the CDM-PDD.	EB 39	Ann 10	Yes The spread excel sheet for IRR calculation has been appropriately provided  Pending on close CAR-14, CAR-15, CAR-16, CAR-17, CAR-18, CAR-19	Pending	OK
iii. Justify and/or cite assumptions.	EB 39	Ann 10	All indicators are from FSR, decision on approving invest, legislation By document checking, validation team can confirm all source data are correct  Pending on close CAR-14, CAR-15, CAR-16, CAR-17, CAR-18, CAR-19	Pending	OK
iv. In calculating the financial/economic indicator, the project's risks can be included through the cash flow pattern, subject to project-specific expectations and assumptions.	EB 39	Ann 10	Yes. Relevant costs are included	OK	OK
v. Assumptions and input data for the investment analysis shall not differ across the project activity and its alternatives, unless differences can be well substantiated.	EB 39	Ann 10	Not applicable as option III was used	-	-
vi. Present in the CDM-PDD a clear comparison of the financial indicator for the proposed CDM activity. Please specify details for above.	EB 39	Ann 10	As calculated, the IRR without revenue from CER is 11.98% which is lower the selected benchmark 13.6% Pending on close CAR-14, CAR-15, CAR-16, CAR-17, CAR-18, CAR-19	Pending	OK
r. Has the below guideline followed for Sub-step 2d: Sensitivity analysis (only applicable to Options II and III)? Include a sensitivity analysis that shows whether the conclusion regarding the financial/economic attractiveness is robust to	EB 39	Ann 10	Yes Three main variable factors are identified for sensitivity analysis of the project including Annual amount of electricity exported to the national grid; Investment Costs; Feed in price with variation	CL-5	OK

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reasonable variations in the critical assumptions.			range from -10% to +10%  CL-5 was issued CL-5: In the Sensitivity analysis PDD version 1.0, the statement to excluded total O&M cost is not available		
s. Has the outcome of Step 2 clearly mentioned with justification?	EB 39	Ann 10	Yes. It concludes that: the project is not financially attractive without CER revenue	OK	OK
t. In step 3: Barrier analysis have all the sub-steps as below been followed?	EB 39	Ann 10			
i. Sub-step 3a: Identify barriers that would prevent the implementation of the proposed CDM project activity;	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
ii. Sub-step 3 b: Show that the identified barriers would not prevent the implementation of at least one of the alternatives (except the proposed project activity).	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
u. Has the below guideline followed for Sub-step 3a: Identify barriers that would prevent the implementation of the proposed CDM project?	EB 39	Ann 10			
i. (a) Investment barriers: For alternatives undertaken and operated by private entities: Similar activities have only been implemented with grants or other non-commercial finance terms. No private capital is available from domestic or international capital markets due to real or perceived risks associated with investment in the country where the proposed CDM project activity is to be implemented, as demonstrated by the credit rating of the country	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-



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or other country investments reports of reputed origin.					
ii. (b) Technological barriers: Skilled and/or properly trained labour to operate and maintain the technology is not available in the relevant country/region, which leads to an unacceptably high risk of equipment disrepair and malfunctioning or other underperformance; Lack of infrastructure for implementation and logistics for maintenance of the technology, Risk of technological failure: the process/technology failure risk in the local circumstances is significantly greater than for other technologies that provide services or outputs comparable to those of the proposed CDM project activity, as demonstrated by relevant scientific literature or technology manufacturer information, The particular technology used in the proposed project activity is not available in the relevant region.	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
iii. (c) Barriers due to prevailing practice: The project activity is the “first of its kind”.	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
iv. (d) Other barriers, preferably specified in the underlying methodology as examples.	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
v. Has the outcome from Step 3a clearly mentioned in PDD?	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
w. Has the below guideline followed for Sub-step 3 b: Show that the identified barriers would not prevent the implementation of at least one of the alternatives (except the proposed project activity)?	EB 39	Ann 10			

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i. If the identified barriers also affect other alternatives, explain how they are affected less strongly than they affect the proposed CDM project activity. In other words, demonstrate that the identified barriers do not prevent the implementation of at least one of the alternatives. Any alternative that would be prevented by the barriers identified in Sub-step 3a is not a viable alternative, and shall be eliminated from consideration.	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
ii. Provide transparent and documented evidence, and offer conservative interpretations of this documented evidence, as to how it demonstrates the existence and significance of the identified barriers and whether alternatives are prevented by these barriers.	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
iii. The type of evidence to be provided should include at least one of the following: (a) Relevant legislation, regulatory information or industry norms; (b) Relevant (sectoral) studies or surveys (e.g. market surveys, technology studies, etc) undertaken by universities, research institutions, industry associations, companies, bilateral/multilateral institutions, etc; (c) Relevant statistical data from national or international statistics; (d) Documentation of relevant market data (e.g. market prices, tariffs, rules); (e) Written documentation of independent expert judgments from industry, educational institutions (e.g. universities, technical schools, training centres), industry	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-

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associations and others. Please specify.					
x. Has the outcome from Step 3 clearly mentioned in PDD?	EB 39	Ann 10	Because Barrier analysis was not selected. This section will be not applicable	-	-
y. In step 4: Common practise analysis have all the sub-steps as below followed?	EB 39	Ann 10		OK	OK
i. Sub-step 4a: Analyze other activities similar to the proposed project activity;	EB 39	Ann 10	Yes	OK	OK
ii. Sub-step 4b: Discuss any similar Options that are occurring.	EB 39	Ann 10	Yes	OK	OK
z. Has the below guideline followed for Sub-step 4a: Analyze other activities similar to the proposed project activity? Provide an analysis of any other activities that are operational and that are similar to the proposed project activity. Other CDM project activities are not to be included in this analysis. Provide documented evidence and, where relevant, quantitative information. On the basis of that analysis, describe whether and to which extent similar activities have already diffused in the relevant region.	EB 39	Ann 10	<p>Yes.</p> <p>06 hydropower projects are identified for common practice analysis</p> <ul style="list-style-type: none"> <li>- Nam Mu with installed capacity of 12 MW</li> <li>- Ea Krong Rou with installed capacity of 28 MW</li> <li>- Suoi Sap with installed capacity of 14.4 MW</li> <li>- Nam Tha 6 with installed capacity of 6 MW</li> <li>- Ngoi Xan 1 with installed capacity of 8.1 MW</li> <li>- Na Loi with installed capacity of 9.3 MW</li> </ul> <p>CAR-20 was issued</p> <p>CAR-20: In the Common practice analysis, PDD version 1.0 excluded “Nam Tha 6” and “Ngoi Xan 1” projects because they are developed as CDM projects. However, by cross – checking with UNFCCC website, Validation did not found mentioned projects as CDM projects</p>	CAR-20	OK
aa. Has the below guideline followed for Sub-step 4b: Discuss any similar Options that are occurring? If similar activities are identified, then it is necessary to demonstrate why the existence of these activities does not contradict the claim that	EB 39	Ann 10	<p>Yes.</p> <p>CAR-21 and CL-6 were issued</p> <p>CAR-18: In the Common practice analysis,</p>	CAR-21 CL-6	OK

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the proposed project activity is financially/economically unattractive or subject to barriers. This can be done by comparing the proposed project activity to the other similar activities, and pointing out and explaining essential distinctions between them that explain why the similar activities enjoyed certain benefits that rendered it financially/economically attractive (e.g., subsidies or other financial flows) and which the proposed project activity cannot use or did not face the barriers to which the proposed project activity is subject. In case similar projects are not accessible, the PDD should include justification about non-accessibility of data/information.			sources to provide information of Na Loi hydropower project and Nam Mu hydropower project cannot substantiate the provided information in the PDD version 1.0 CL-6: In the Common practice, the justification of load factor of the Project is not available		
bb. Has the outcome from Step 4 clearly mentioned in PDD?	EB 39	Ann 10	Yes. The Project is not common practice in Vietnam	OK	OK
cc. Has it been proved that the project is additional?	EB 39	Ann 10	Yes. By means of checking relevant evidences, validation team confirm that the Project is additional	OK	OK

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<b>a. Prior consideration of the clean development mechanism</b>					
a. Is the project activity start date prior to the date of publication of the PDD for stakeholder comments?	VVM	98	<p>Yes</p> <p>The date of publication of the PDD for stakeholders comment is 11<sup>th</sup> May 2011 and the starting date of the Project is 10<sup>th</sup> Sep 2010</p> <p>Pending on close CAR-8</p>	Pending	OK
b. If yes, were the CDM benefits considered necessary in the decision to undertake the project as a proposed CDM project activity?	VVM	98	<p>Yes.</p> <p>Additional support from CDM was suggested to make the Project to be financial attractive</p> <p>Supporting evidences includes:</p> <ul style="list-style-type: none"> <li>- Management board meeting minutes</li> <li>- Document submitted by Local People Committee to DNA of Vietnam and EB</li> <li>- Equipment purchased contract</li> <li>- EPC (Engineering, Procurement and Construction) contract</li> </ul> <p>CAR-22, CAR-23 were issued</p> <p>CAR-22: In the section B.5, PDD version 1.0 stated that the Project participants notified the proposed project activity to EB and Vietnam DNA on 21<sup>st</sup> Dec 2009. However, by cross – checking relevant documents, Validation team confirm that the notification was made on 27<sup>th</sup> Oct 2009</p> <p>CAR-23: The Feasibility Study Report (FSR) was revised and approved according to the change of installed capacity. However, the</p>	CAR-22 CAR-23	OK

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			issuance and the approval of FSR are not available in the key milestones of the Project		

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c. Is the start date of the project activity, reported in the PDD, in accordance with the “Glossary of CDM terms”, which states that “The starting date of a CDM project activity is the earliest date at which either the implementation or construction or real action of a project activity begins.”?	VVM	99	Yes	OK	OK
d. Does the project activity require construction, retrofit or other modifications?	VVM	99	The project activities require construction of new hydro power plant	OK	OK
e. If yes, is it ensured that the date of commissioning cannot be considered as the project activity start date?	VVM	99	At the time of validation, the project has not commissioned yet. Thus, the commissioning date will not be considered as project activity start date	OK	OK
f. Is it a new project activity (a project activity with a start date on or after 02 August 2008) or an existing project activity (a project activity with a start date before 02 August 2008)?	VVM	100	Based on above explanation, the starting date of this project is after 02 <sup>nd</sup> Aug 2008. Thus, this is a new project activity	OK	OK
g. For a new project, for which PDD has not been published for global stakeholder consultation or a new methodology proposed to the CDM Executive Board before the project activity start date, had PPs informed the host Party DNA and the UNFCCC secretariat in writing of the commencement of the project activity and of their intention to seek CDM status? (Provide reference to such confirmation from host Party DNA and UNFCCC secretariat).	VVM	101	Yes  By checking document submitted by project owner to DNA and EB, validation team can confirm	OK	OK
h. For an existing project activity, for which the start date is prior to the date of publication of the PDD for global stakeholder consultation, are the	VVM	102	Not applicable	-	-

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following evidences provided:					
ii. evidence that must indicate that awareness of the CDM prior to the project activity start date, and that the benefits of the CDM were a decisive factor in the decision to proceed with the project, including, inter alia:	VVM	102	Not applicable	-	-
a. minutes and/or notes related to the consideration of the decision by the Board of Directors, or equivalent, of the project participant, to undertake the project as a proposed CDM project activity?	VVM	102	Not applicable	-	-
iii. reliable evidence from project participants that must indicate that continuing and real actions were taken to secure CDM status for the project in parallel with its implementation, including, inter alia:	VVM	102	Not applicable	-	-
a. contract with consultants for CDM/PDD/methodology services?	VVM	102	Not applicable	-	-
b. Emission Reduction Purchase Agreements or other documentation related to the sale of the potential CERs (including correspondence with multilateral financial institutions or carbon funds)?	VVM	102	Not applicable	-	-
c. evidence of agreements or negotiations with a DOE for validation services?	VVM	102	Not applicable	-	-
d. submission of a new methodology to the CDM Executive Board?	VVM	102	Not applicable	-	-
e. publication in newspaper?	VVM	102	Not applicable	-	-
f. interviews with DNA?	VVM	102	Not applicable	-	-
g. earlier correspondence on the project with	VVM	102	Not applicable	-	-



CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
the DNA or the UNFCCC secretariat?					
h. Has the chronology of events including time lines been appropriately captured and explained/detailed in the PDD?	VVM	102	Not applicable	-	-
<b>b. Identification of alternatives</b>					
a. Does the approved methodology that is selected by the proposed CDM project activity prescribe the baseline scenario and hence no further analysis is required?	VVM	105	Yes It has prescribed the baseline scenario as per ACM0002	OK	OK
b. If no, does the PDD identify credible alternatives to the project activity in order to determine the most realistic baseline scenario?	VVM	105	Not applicable	-	-
c. Does the list of alternatives given in the PDD ensure that:	VVM	106		OK	OK
i. the list of alternatives includes as one of the options that the project activity is undertaken without being registered as a proposed CDM project activity?	VVM	106	Yes. Alternative 1 is the proposed project activity undertaken without CDM registration	OK	OK
ii. the list contains all plausible alternatives that the DOE, on the basis of its local and sectoral knowledge, considers to be viable means of supplying the outputs or services that are to be supplied by the proposed CDM project activity?	VVM	106	Yes	OK	OK
iii. the alternatives comply with all applicable and enforced legislation?	VVM	106	Yes	OK	OK
<b>c. Investment analysis</b>					
a. Has investment analysis been used to demonstrate the additionality of the proposed CDM project activity?	VVM	108	Yes	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
b. If yes, does the PDD provide evidence that the proposed CDM project activity would not be:	VVM	108		OK	OK
i. the most economically or financially attractive alternative?	VVM	108	Not applicable	-	-
ii. economically or financially feasible, without the revenue from the sale of certified emission reductions (CERs)?	VVM	108	Yes. The project IRR without CER revenue is 11.98% versus the selected benchmark 13.6% Pending on close CAR-14, CAR-15, CAR-16, CAR-17, CAR-18, CAR-19	Pending	OK
c. Was this shown by one of the following approaches?	VVM	109			
i. The proposed CDM project activity would produce no financial or economic benefits other than CDM-related income. Document the costs associated with the proposed CDM project activity and the alternatives identified and demonstrate that there is at least one alternative which is less costly than the proposed CDM project activity.	VVM	109	Not applicable	-	-
ii. The proposed CDM project activity is less economically or financially attractive than at least one other credible and realistic alternative.	VVM	109	Not applicable	-	-
iii. The financial returns of the proposed CDM project activity would be insufficient to justify the required investment.	VVM	109	Yes. The project IRR without CER revenue is 11.98% versus the selected benchmark 13.6% Pending on close CAR-14, CAR-15, CAR-16, CAR-17, CAR-18, CAR-19	Pending	OK
d. Is the period of assessment limited to the proposed crediting period of the CDM project activity?	EB 62	Ann 05	The project participant chose a lifetime of 37 years to assess the cash flows for the project IRR. The chosen period of 37 years for financial	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
			assessment is deemed to be appropriate. The project owner chose a linear depreciation over 20 years period. No fair value remains.		

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
e. Does the project IRR and equity IRR calculations reflect the period of expected operation of the underlying project activity (technical lifetime), or - if a shorter period is chosen - include the fair value of the project activity assets at the end of the assessment period?	EB 62	Ann 05	Yes. Project IRR are calculated for 37 years Spread excel sheet is provided	OK	OK
f. Does the IRR calculation include the cost of major maintenance and/or rehabilitation if these are expected to be incurred during the period of assessment?	EB 62	Ann 05	Yes. Operation and Maintenance cost are included accordingly with Vietnamese laws	OK	OK
g. Do the project participants justify the appropriateness of the period of assessment in the context of the underlying project activity, without reference to the proposed CDM crediting period?	EB 62	Ann 05	Yes. Accordingly with EB50, Annex 15, hydro turbines have default value for technical lifetime 150,000 hours. Operation time of the Project is estimated 4,156 hours (based on capacity). Thus, technical lifetime of the Project is about 37 years  Pending on close CAR-12	Pending	OK
h. Does the cash flow in the final year include a fair value of the project activity assets at the end of the assessment period?	EB 62	Ann 05	The depreciation of the fixed asset investment is linear over the 20 years assessment period. Thus after 20 years the fair value is 0.	OK	OK
i. Has the fair value been calculated in accordance with local accounting regulations where available, or international best practice?	EB 62	Ann 05	Yes. It is in accordance with international best practice and thus assessed as OK.	OK	OK
j. Does the fair value calculations include both the book value of the asset and the reasonable expectation of the potential profit or loss on the realization of the assets?	EB 62	Ann 05	The investment is completely depreciated. Thus no fair value remains.	OK	OK
k. Was depreciation, and other non-cash items related to the project activity, which have been deducted in estimating gross profits on which tax is calculated, added back to net profits for the	EB 62	Ann 05	Yes. Pending on close CAR-14, CAR-15, CAR-16, CAR-17, CAR-18, CAR-19	Pending	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
purpose of calculating the financial indicator (e.g. IRR, NPV)?					
l. Has taxation been included as an expense in the IRR/NPV calculation in cases where the benchmark or other comparator is intended for post-tax comparisons?	EB 62	Ann 05	Because the Project applied pre – tax analysis thus it is not applicable	-	-
m. Are the input values used in all investment analysis valid and applicable at the time of the investment decision taken by the project participant?	EB 62	Ann 05	Yes. By checking document, validation team confirm that input values are correctly applied Pending on close CAR-17, CAR-18, CAR-19	Pending	OK
n. Is the timing of the investment decision consistent and appropriate with the input values?	EB 62	Ann 05	Yes Pending on close CAR-17, CAR-18, CAR-19	Pending	OK
o. Are all the listed input values been consistently applied in all calculations?	EB 62	Ann 05	Yes. Pending on close CAR-17, CAR-18, CAR-19	Pending	OK
p. Does the investment analysis reflect the economic decision making context at point of the decision to recommence the project in the case of project activities for which implementation ceases after the commencement and where implementation is recommenced due to consideration of the CDM?	EB 62	Ann 05	The input values for the investment were derived from the FSR, which was prepared in Mar 2009 revised, finished in Apr 2010. The decision to invest in the project was taken in 24 <sup>th</sup> Jun 2010 during the Board meeting of the management. It took about 2 months between issuance of FSR and the management decision. The DOE can confirm that the period is assessed as short enough so that material changes to the input values are unlikely. This assessment is based on the issuance of the investment license by the Vietnamese government in Oct 2009, where the same values were confirmed.	OK	OK
q. Have project participants supplied the spreadsheet versions of all investment analysis?	EB 62	Ann 05	Yes. Unprotected spreadsheets of calculation are provided	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
r. Are all formulas used in this analysis readable and all relevant cells be viewable and unprotected?	EB 62	Ann 05	Yes	OK	OK
s. In cases where the project participant does not wish to make such a spreadsheet available to the public has the PP provided an exact read-only or PDF copy for general publication?	EB 62	Ann 05	Not applicable	-	-
t. In case the PP wishes to black-out certain elements of the publicly available version, is it justifiable?	EB 62	Ann 05	Not applicable	-	-
u. Was the cost of financing expenditures (i.e. loan repayments and interest) included in the calculation of project IRR?	EB 62	Ann 05	Yes	OK	OK
v. In the calculation of equity IRR, has only the portion of investment costs which is financed by equity been considered as the net cash outflow?	EB 62	Ann 05	Not applicable	-	-
w. Has the portion of the investment costs which is financed by debt been considered a cash outflow in the calculation of equity IRR? (this is not allowed)	EB 62	Ann 05	Not applicable	-	-
x. Was a pre-tax benchmark be applied?	EB 62	Ann 05	Yes	OK	OK
y. In cases where a post-tax benchmark is applied, is actual interest payable taken into account in the calculation of income tax?	EB 62	Ann 05	Not applicable	-	-
z. In such situations, was interest calculated according to the prevailing commercial interest rates in the region, preferably by assessing the cost of other debt recently acquired by the project developer and by applying a debt-equity ratio used by the project developer for investments	EB 62	Ann 05	Yes	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
taken in the previous three years?					
aa. In cases where a benchmark approach is used is the applied benchmark appropriate to the type of IRR calculated?	EB 62	Ann 05	Yes. Project IRR was calculated	OK	OK
bb. Has local commercial lending rates or weighted average costs of capital (WACC) selected as appropriate benchmarks for a project IRR?	EB 62	Ann 05	Local Lending Rate is selected as benchmark for a project IRR, accordingly to "Tool for the demonstration and assessment for additionality"	OK	OK
cc. Has required/expected returns on equity selected as appropriate benchmark for an equity IRR?	EB 62	Ann 05	Yes	OK	OK
dd. In case benchmarks supplied by relevant national authorities selected is it applicable to the project activity and the type of IRR calculation presented?	EB 62	Ann 05	Yes	OK	OK
ee. In the cases of projects which could be developed by an entity other than the project participant is the benchmark applied based on publicly available data sources which can be clearly validated?	EB 62	Ann 05	Because the Project will not be developed by another entity, this section will be not applicable	-	-
ff. Have internal company benchmarks/expected returns (including those used as the expected return on equity in the calculation of a weighted average cost of capital - WACC) been applied in cases where there is only one possible project developer?	EB 62	Ann 05	Not applicable	-	-
gg. In such cases, have these values been used for similar projects with similar risks, developed by the same company or, if the company is brand new, would have been used for similar projects in the same sector in the country/region?	EB 62	Ann 05	Yes	OK	OK
hh. Has a minimum clear evidence of the resolution by the company's Board and/or shareholders	EB 62	Ann 05	Yes	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
been provided to the effect as above?					
ii. Has a thorough assessment of the financial statements of the project developer - including the proposed WACC - to assess the past financial behavior of the entity during at least the last 3 years in relation to similar projects been conducted?	EB 62	Ann 05	Not applicable	-	-
jj. Does the risk premiums applied in the determination of required returns on equity reflect the risk profile of the project activity being assessed, established according to national/international accounting principles? (It is not considered reasonable to apply the rate general stock market returns as a risk premium for project activities that face a different risk profile than an investment in such indices.)	EB 62	Ann 05	Not applicable	-	-
kk. Has an investment comparison analysis and not a benchmark analysis used when the proposed baseline scenario leaves the project participant no other choice than to make an investment to supply the same (or substitute) products or services?	EB 62	Ann 05	Not applicable	-	-
ll. Have variables, including the initial investment cost, that constitute more than 20% of either total project costs or total project revenues been subjected to reasonable variation (positive and negative) and the results of this variation been presented in the PDD and be reproducible in the associated spreadsheets?	EB 62	Ann 05	Yes	OK	OK
mm. Have a corrective action been raised for a variable to be included in the sensitivity analysis	EB 62	Ann 05	No	OK	OK



CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
which constitute less than 20% and have a material impact on the analysis ?					
nn. Is the range of variations selected is reasonable in the project context?	EB 62	Ann 05	Yes	OK	OK
oo. Dos the variations in the sensitivity analysis at least cover a range of +10% and -10%, unless this is not deemed appropriate in the context of the specific project circumstances?	EB 62	Ann 05	Yes	OK	OK
pp. In cases where a scenario will result in the project activity passing the benchmark or becoming the most financially attractive alternative, is an assessment done of the probability of the occurrence of this scenario in comparison to the likelihood of the assumptions in the presented investment analysis, taking into consideration correlations between the variables as well as the specific socio-economic and policy context of the project activity?	EB 62	Ann 05	No	OK	OK
qq. Was the plant load factor defined ex-ante in the CDM-PDD according to one of the following options:	EB 48	Ann 11		OK	OK
i. The plant load factor provided to banks and/or equity financiers while applying the project activity for project financing, or to the government while applying the project activity for implementation approval?	EB 48	Ann 11	Not applicable	-	-
ii. The plant load factor determined by a third party contracted by the project participants (e.g. an engineering company)?	EB 48	Ann 11	Yes. The load factor of plant defined in the Feasibility Study report	OK	OK
rr. Was a thorough assessment of all parameters and assumptions used in calculating the relevant	VVM	111	Yes	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
financial indicator, and determine the accuracy and suitability of these parameters using the available evidence and expertise in relevant accounting practices conducted?					
ss. Were the parameters cross-checked against third-party or publicly available sources, such as invoices or price indices?	VVM	111	Yes. All reliable sources were cross-checked by Validation team and confirmed	OK	OK
tt. Were feasibility reports, public announcements and annual financial reports related to the proposed CDM project activity and the project participants reviewed?	VVM	111	Yes	OK	OK
uu. Was the correctness of computations carried out and documented by the project participants assessed?	VVM	111	Yes	OK	OK
vv. Was the sensitivity analysis by the project participants to determine under what conditions variations in the result would occur, and the likelihood of these conditions assessed?	VVM	111	Yes. 3 parameters were analysed (annual amount of electricity exported to the national grid; Investment costs and feed-tariff set by EVN) with $\pm 10\%$ variations. Validation team confirm that Sensitivity analysis is correctly conducted  Pending on close CL-5	Pending	OK
ww. Is the type of benchmark applied is suitable for the type of financial indicator presented?	VVM	112	Yes. Local Lending Rate was applied appropriately	OK	OK
xx. Do any risk premiums applied determining the benchmark reflect the risks associated with the project type or activity?	VVM	112	No	OK	OK
yy. To determine this, was it assessed whether it is reasonable to assume that no investment would be made at a rate of return lower than the benchmark by:	VVM	112		OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
i. assessing previous investment decisions by the project participants involved?	VVM	112	Because the Project is the first project invested by Song Bung JSC therefore this section will be not applicable	-	-
ii. determining whether the same benchmark has been applied?	VVM	112	Yes	OK	OK
iii. determining if there are verifiable circumstances that have led to a change in the benchmark?	VVM	112	Yes	OK	OK
zz. Did the project participants rely on values from Feasibility Study Reports (FSR) that are approved by national authorities for proposed CDM project activities?	VVM	113	Yes	OK	OK
xx. If yes:	VVM	113		OK	OK
i. has the FSR been the basis of the decision to proceed with the investment in the project, i.e. that the period of time between the finalization of the FSR and the investment decision is sufficiently short for the DOE to confirm that it is unlikely in the context of the underlying project activity that the input values would have materially changed?	VVM	113	Yes	OK	OK
ii. Are the values used in the PDD and associated annexes fully consistent with the FSR?	VVM	113	Yes. By document checking, Validation team confirm that all values used in the PDD are consistent with the FSR sources	OK	OK
iii. If not, was the appropriateness of the values validated?	VVM	113	Not applicable	-	-
iv. On the basis of its specific local and sectoral expertise, is confirmation provided, by cross-checking or other appropriate manner, that the input values from the FSR	VVM	113	Yes. By cross – checking with all relevant sources, with respect to time for decision making, Validation team confirm that all input value from the FSR are correct and properly applied	OK	OK

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are valid and applicable at the time of the investment decision?					
<b>d. Barrier analysis</b>					
a. Has barrier analysis been used to demonstrated the additionality of the proposed CDM project activity?	VVM	115	No	OK	OK
b. If yes, does the PDD demonstrate that the proposed CDM project activity faces barriers that:	VVM	115		OK	OK
i. prevent the implementation of this type of proposed CDM project activity?	VVM	115	Not applicable	-	-
ii. do not prevent the implementation of at least one of the alternatives?	VVM	115	Not applicable	-	-
c. Are there any issues that have a clear direct impact on the financial returns of the project activity, other than: risk related barriers, for example risk of technical failure, that could have negative effects on the financial performance; or barriers related to the unavailability of sources of finance for the project activity? {If yes, these issues cannot be considered barriers and shall be assessed by investment analysis. [Refer to (6.c) above]}	VVM	116	Not applicable	-	-
d. Were the barriers determined as real by:	VVM	117		-	-
i. assssing the available evidence and/or undertaking interviews with relevant individuals (including members of industry associations, government officials or local experts if necessary) to determine whether the barriers listed in the PDD exist?	VVM	117	Not applicable	-	-
ii. ensuring that existence of barriers is	VVM	117	Not applicable	-	-

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substantiated by independent sources of data such as relevant national legislation, surveys of local conditions and national or international statistics?					
iii. Is existence of a barrier substantiated only by the opinions of the project participants? (If yes, this barrier cannot be considered as adequately substantiated)	VVM	117	Not applicable	-	-
e. Were the barriers determined as preventing the implementation of the project activity but not the implementation of at least one of the possible alternatives by applying local and sectoral expertise to judge whether a barrier or set of barriers would prevent the implementation of the proposed CDM project activity and would not equally prevent implementation of <i>at least one of</i> the possible alternatives, in particular the identified baseline scenario?	VVM	117	Not applicable	-	-
<b>e. Common practice analysis</b>					
a. Is this a proposed large-scale, or first-of-its kind small-scale project activity?	VVM	119	Yes. It is a large scale project. The installed capacity is 29 MW	OK	OK
b. If yes, was common practice analysis carried out as a credibility check of the other available evidence used by the project participants to demonstrate additionality?	VVM	119	Yes. Common practice was conducted appropriately by project participant	OK	OK
c. Was it assessed whether the geographical scope (e.g. defined region) of the common practice analysis is appropriate for the assessment of common practice related to the project activity's technology or industry type? (For	VVM	120	Yes. Similar projects are projects with installed capacity larger and equal than 5 MW and smaller than 50 MW; started construction post August 2001, not developed by State – owned organization in the entire Vietnam country	OK	OK

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certain technologies the relevant region for assessment will be local and for others it may be transnational/global.					
d. Was a region other than the entire host country chosen?	VVM	120	No. The entire Vietnam was selected for Common practice	OK	OK
e. If yes, was the explanation why this region is more appropriate assessed?	VVM	120	Not applicable	-	-
f. Using official sources and local and industry expertise, was it determined to what extent similar and operational projects (e.g., using similar technology or practice), other than CDM project activities, have been undertaken in the defined region?	VVM	120	Yes	OK	OK
g. Are similar and operational projects, other than CDM project activities, already "widely observed and commonly carried out" in the defined region?	VVM	120	No. The proposed project is not common practice in Vietnam  Pending on close CAR-20, CAR-21, CL-6	Pending	OK
h. If yes, was it assessed whether there are essential distinctions between the proposed CDM project activity and the other similar activities?	VVM	120	Not applicable	-	-
<b>7. Monitoring plan</b>					
a. Does the PDD include a monitoring plan?	VVM	122	Yes	OK	OK
b. Is this monitoring plan based on the approved monitoring methodology applied to the proposed CDM project activity?	VVM	122	Yes	OK	OK
c. Were the list of parameters required by the the selected methodology identified?	VVM	123	Yes	OK	OK
d. Does the monitoring plan contains all necessary parameters?	VVM	123	Yes  Only the quantity of net electricity supplied by the	OK	OK

CHECKLIST QUESTION	Ref.	§	COMMENTS	Draft Concl	Final Concl
			project to the grid is required ( $EG_{y,export}$ ) by the ACM0002, version 12.2.0. This parameter is included in the Monitoring plan		

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e. Are the parameters clearly described?	VVM	123	Yes	OK	OK
f. Does the means of monitoring described in the plan comply with the requirements of the methodology?	VVM	123	Yes	OK	OK
g. Are all data and parameters monitored as per monitoring methodology?	ACM	0002 v.12.2 .0	Yes	OK	OK
h. Are all data collected as part of monitoring archived electronically and kept at least for 2 years after the end of the last crediting period?	ACM	0002 v.12.2 .0	Yes. By monitoring procedure, data will be archived and kept 2 years after the crediting period	OK	OK
i. Are 100% of the data monitored, if not indicated otherwise?	ACM	0002 v.12.2 .0	Yes	OK	OK
j. Are measurements conducted with calibrated measurement equipment according to relevant industry standards?	ACM	0002 v.12.2 .0	Yes. The monitoring meter will be calibrated every year by authorized parties. Validation team confirm the calibration procedure is compliance with Vietnamese standards	OK	OK
k. Are the monitoring provisions in the tools referred to in the methodology correctly applied?	ACM	0002 v.12.2 .0	Yes	OK	OK
l. Are the monitoring arrangements described in the monitoring plan feasible within the project design?	VVM	123	Yes	OK	OK
m. Are the following means of implementation of the monitoring plan sufficient to ensure that the emission reductions achieved by/resulting from the proposed CDM project activity can be reported ex post and verified:	VVM	123		OK	OK
i. data management procedures?	VVM	123	Yes	OK	OK
ii. quality assurance procedures?	VVM	123	Yes	OK	OK
iii. quality control procedures?	VVM	123	Yes	OK	OK
<b>8. Sustainable development</b>					
a. Does the CDM project activity assists Parties not	VVM	125	Pending on close CAR-1	Pending	OK



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included in Annex I to the Convention in achieving sustainable development?					
b. Does the letter of approval by the DNA of the host Party confirm the contribution of the proposed CDM project activity to the sustainable development of the host Party?	VVM	126	Pending on close CAR-1, CAR-2	Pending	OK
<b>9. Local stakeholder consultation</b>					
a. Were local stakeholders (public, including individuals, groups or communities affected, of likely to be affected, by the proposed CDM project activity or actions leading to the implementation of such an activity) invited by the PPs to comment on the proposed CDM project activity prior to the publication of the PDD on the UNFCCC website?	VVM	128	Yes. Representatives of local People Committees, local people in the affected areas were interviewed to join the meeting in order to consult and comment on the proposed project in Mar 2009	OK	OK
b. Have comments by local stakeholders that can reasonably be considered relevant for the proposed CDM project activity been invited?	VVM	129	Yes Yes. The local stakeholders are all supportive of the proposed project. Hence, it is unnecessary to modify the project design according to comments received	OK	OK
c. Is the summary of the comments received as provided in the PDD complete?	VVM	129	Yes By record checking and interviewing, validation team can confirm	OK	OK
d. Have the project participants taken due account of any comments received and described this process in the PDD?	VVM	129	Yes	OK	OK
<b>10. Environmental impacts</b>					
a. Have the project participants submitted documentation on the analysis of the	VVM	131	Yes Environmental Impact Assessment Report was	OK	OK

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environmental impacts of the project activity?			made by authorized party and approved by Local People Committee		
b. Have the project participants undertaken an analysis of environmental impacts?	VVM	132	Yes	OK	OK
c. Does the host Party require an environmental impact assessment?	VVM	132	Yes	OK	OK
d. If yes, have the project participants undertaken an environmental impact assessment?	VVM	132	Yes	OK	OK



**Table 2 Resolution of Corrective Action and Clarification Requests**

Draft report clarifications and corrective action requests by validation team	Ref. to checklist question in table 1 and 2	Summary of project owner response	Validation team conclusion
<p><b>CAR-1:</b> The Letter of Approval from Vietnam is not available in this stage of validation.</p>	<p>1.a 1.b 1.c 1.e 1.f 1.g 2.b 2.g 2.h 2.i 8.a 8.b</p>	<p>The LoA of Vietnam is provided to DoE</p>	<p>The LoA of Vietnam has already submitted to Bureau Veritas by scanned version. It was officially signed by Mr. Nguyen Khac Hieu, Deputy Director General of Department of Meteorology, Hydrology and Climate Change, DNA of Vietnam. This has been cross – checked via UNFCCC website. In the LoA, it is clearly stated that Vietnam has already ratified the Kyoto Protocol and that it participates voluntarily in the CDM. Besides, it authorized VNEEC and SBJSC to participate the Project without obligations. It also confirmed that the Project contributes the sustainable development in Vietnam. This document is assessed reliable. Comparing the PDD and LoA, it could be confirmed that the title of the Project and the name of project participants are exactly matching. Thus, CAR is closed</p>

<p><b>CAR-2:</b> The Letter of Approval from Switzerland will be provided before submission for registration.</p>	<p>1.a 1.b 1.c 1.e 1.f 1.g 2.b 2.g 2.h 2.i 8.b</p>	<p>The LoA of Switzerland is provided to DoE</p>	<p>The LoA of Switzerland has already submitted to Bureau Veritas by scanned version. It was officially signed by Mr. Yvan Keckeis, Senior Policy Officer, Federal Office for the Environment, DNA of Switzerland. This has been cross – checked via UNFCCC website. In the LoA, it is clearly stated that Switzerland has already ratified the Kyoto Protocol and that it participates voluntarily in the CDM. It also authorized Vietnam Carbon Assets Ltd to participate the Project without obligations. This document is assessed reliable. Comparing the PDD and LoA, it could be confirmed that the title of the Project and the name of project participants are exactly matching. Thus, CAR is closed</p>
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<p><b>CAR-3:</b> In the PDD version 1.0, section A.2, PDD stated that the Project will supply the Electricity to the National grid via signed Power Purchasing Agreement (PPA) between Project owner and Electricity Corporation Vietnam (EVN). However, by cross – checking documents and interviewing, Validation team confirm that the PPA was not signed at the stage of validation</p>	<p>3.d</p>	<p>The PDD has been revised as” The project’s purpose is to generate and to supply renewable electricity to the national grid via the Power Purchase Agreement (PPA) will be signed with the Electricity Corporation of Vietnam (EVN)”</p>	<p>By checking revised PDD, Validation team confirmed that provided information is correct. CAR is closed</p>
<p><b>CAR-4:</b> In the PDD version 1.0, source 8 and source 29 state that the parasitic and loss load is 1%. However, source 2 and in the excel spread sheet, the applied parasitic and loss load is 1.5%</p>	<p>3.d</p>	<p>There is a typo mistake in the PDD, the parasitic and loss load is 1.5%. The PDD has been revised according to the request of DOE.</p>	<p>By checking PDD version 2.3 as well as cross – checking with supporting documents, Validation team confirmed that the parasitic and loss load of the Project is 1.5%, consistently with Vietnamese legislation. CAR is closed</p>

<b>CAR-5:</b> By means of checking provided documents, Validation team confirm that the Project located on Bung river, in Ma Cooih and Ka Dang communes, Dong Giang district and Thanh My town, Nam Giang district, Quang Nam province. However, in the PDD version 1.0, section A.2 and A.4.1.4, Ka Dang Commune is not mentioned appropriately	3.f	The Song Bung 6 hydropower project is located on Bung River which belongs to Ma Cooih and Ka Dang communes, Dong Giang district and Thanh My town, Nam Giang district, Quang Nam province. The PDD has been revised according to the request of DOE.	By checking PDD version 2.3 and cross – checking with FSR, supporting documents, Validation team confirmed that the Project locates in Ma Cooih and Ka Dang communes and Thanh My town, Quang Nam province, correctly with description in the PDD. CAR is closed
<b>CAR-6:</b> In the PDD version 1.0, section A.4.3, “the scope of activities/measures that are being implemented within the project activity” was not demonstrated as per requirements in EB41, Annex 12	3.h	The PDD has been revised according to the request of DOE	The sufficient information was provided in the PDD version 2.3. By checking document, Validation team confirmed that the statement is correct and consistent. CAR is closed
<b>CAR-7:</b> In the PDD version 1.0 (dated 25 <sup>th</sup> Apr 2011); the version of “Tool to calculate the emission factor for an electricity system” (version 2) is not latest version. Version 2.1 of that tool was already issued on 15 <sup>th</sup> Apr 2011	3.k 3.p	The version 2.2.1 of “Tool to calculate the emission factor for an electric system” has been updated into the PDD	By checking revised PDD version 2.3, Validation team confirmed that the latest version of “Tool to calculate the emission factor for an electricity system” was applied accordingly. CAR is closed
<b>CAR-8:</b> PDD version 1.0 stated that the starting date of the project activity is the signed date of the equipment contract (17 <sup>th</sup> Nov 2010). However, by checking provided documents, Validation team found the construction contract for the Project was signed on 10 <sup>th</sup> Sep 2010, prior to the equipment contract. Therefore, the signing date of equipment contract cannot be considered as starting date of the project activity	3.o 3.w	The EPC (Engineering, Procurement and Construction) contract of project which was signed on 10 <sup>th</sup> September 2010 is the earliest contract signed by project owner. Therefore the starting date of project is 10 <sup>th</sup> September 2010. The PDD has been revised according to the request of DOE.	By checking revised PDD and re – cross – checking with Contracts, Validation team confirmed that the statement in the PDD version 2.3 is correct. CAR is closed

<b>CAR-9:</b> In the PDD version 1.0, section B.6.2, the description of $EF_{grid,BM,y}$ and $EF_{grid,CM,y}$ are incorrect	3.q	The description of $EF_{grid,BM,y}$ and $EF_{grid,CM,y}$ have been updated correctly into the PDD	By checking revised PDD, Validation team confirmed that the description of $EF_{grid,BM,y}$ and $EF_{grid,CM,y}$ are correctly modified. CAR is closed
<b>CAR-10:</b> In the excel spread sheet, Emission reductions of the Project was calculated in the crediting period 2013 – 2020. However, in the PDD version 1.0, the crediting period is identified from December 2012 to November 2020. In the section B.6.4, specific date of year for emission reductions is required	3.s 5.e.c	The crediting period for Song Bung 6 hydropower Project will be 2013 – 2019. The information and specific date have been updated into the PDD	By checking PDD version 2.3, Validation team confirmed that the crediting period was identified consistently. CAR is closed
<b>CAR-11:</b> In the PDD version 1.0, accuracy class of meter system is not available as per requirements of Vietnamese Technical Standards	3.u	The corrected accuracy of main and back-up meters have been updated into revised PDD	By checking revised PDD and provided document (Vietnamese legislation), Validation team confirmed that accuracy classes of meters were described sufficiently and correctly. CAR is closed



<b>CAR-12:</b> In the PDD version 1.0, section C.1.2, the source to substantiate the expected operational lifetime of the Project is not available	3.x 6.c.g	The source to substantiate the expected operational lifetime project has been added into the PDD.	Source to substantiate the Project lifetime was provided. The Project lifetime is consistent with EB50, Annex 15. CAR is closed
<b>CAR-13:</b> In the PDD version 1.0, section C.2.1.1, the starting date of the first crediting period is required to add the information of registration date	3.aa	The starting date of the first crediting period has been revised into the PDD	In the revised PDD, Validation team found that registration date was mentioned in relevant section. CAR is closed
<b>CAR-14:</b> In the PDD version 1.0, the benchmark is 13.6%. However, in the excel spread sheet, the benchmark was calculated as 13.5%	6.q 6.c.b 6.c.c 6.c.k	There was a typo mistake, the true number of benchmark is 13.6% and the excel spread sheet file has been revised	By checking PDD version 2.3, cross – checking with reliable and accessible sources, Validation team confirmed that the benchmark is selected compliantly (Local Lending Rate) and applied correctly (13.6%). CAR is closed
<b>CAR-15:</b> In the PDD version 1.0, the expected operational lifetime of the Project is identified as 37 years. However, in the excel spread sheet, the Project IRR only calculated in 36 years	6.q 6.c.b 6.c.c 6.c.k	There was a mistake in financial analysis. Therefore, the spreadsheet and the PDD have been revised. In the PDD version 1.0, the project IRR is 10.79% and in the newest version PDD (2.1), the project IRR is 11.98%. The corrected project IRR is slighted changes but it is still lower than benchmark value (13.6%).	By checking PDD version 2.3 and excel spreadsheet, Validation team confirmed that project IRR was re – calculated in 37 years and confirmed that new project IRR is 11.98, lower than Local lending rate (13.6%). CAR is closed

<p><b>CAR-16:</b> In the investment analysis, table 5 in the PDD version 1.0, sources for “Gross Capacity”, “Total investment cost”, “Construction period” and “Electricity price” are not clear and accessible</p>	<p>6.q 6.c.b 6.c.c 6.c.k</p>	<p>The official sources for “Gross Capacity”, “Total investment cost”, “Construction period” and “Electricity price” have been updated into the PDD</p>	<p>Sources were modified in the PDD version 2.3. By checking revised PDD, cross – checking with new sources, Validation team confirmed that sources are accessible, reliable to substantiate the provided information. CAR is closed</p>
<p><b>CAR-17:</b> In the excel spread sheet, the depreciation time of equipment and constructions is applied according to Decision 206/2003/QD-BTC. However, by checking local regulation, Validation team found that this Decision was expired from 01<sup>st</sup> Jan 2010, prior to Decision making date (24<sup>th</sup> June 2010)</p>	<p>6.q 6.c.b 6.c.c 6.c.k 6.c.l 6.c.m 6.c.n 6.c.o 6.c.y</p>	<p>The newest regulation documents have been updated into the excel spread sheet</p>	<p>By checking in the PDD version 2.3, Validation team confirmed that new legislation was applied. Relevant parameters was re – calculated accordingly. The legislation was in effectiveness at the time of decision making. CAR is closed</p>

<p><b>CAR-18:</b> In the PDD version 1.0, in the investment analysis, the resources tax is applied pursuant to Circular 42/2007/TT-BTC. However, by checking local regulation, Validation team found that this Circular was expired from 01<sup>st</sup> Aug 2008, prior to Decision making date (24<sup>th</sup> June 2010)</p>	<p>6.q 6.c.b 6.c.c 6.c.k 6.c.l 6.c.m 6.c.n 6.c.o 6.c.y</p>	<p>The newest regulations for resources tax have been updated into the PDD.</p> <p>The Circular No 124/2009/TT-BTC issued by Ministry of Finance on 17 June 2009 and the Decision No 588/QD-BTC issued by Ministry of Finance on 22 March 2010 regulates that the resource tax will be calculated as the net electricity outputs supplied to the national electricity grid x 1058 VND x 2%</p>	<p>By checking in the PDD version 2.3, Validation team confirmed that new legislation was applied. Relevant parameters was re – calculated accordingly. The legislation was in effectiveness at the time of decision making. CAR is closed</p>
<p><b>CAR-19:</b> In the investment analysis of PDD version 1.0, the income tax is applied according to Government Decision 124/2008/ND-CP. However, Validation team found that this document is a Decree, issued by Vietnamese Government</p>	<p>6.q 6.c.b 6.c.c 6.c.k 6.c.l 6.c.m 6.c.n 6.c.o 6.c.y</p>	<p>Because benchmark analysis applied pre – tax, Thus this income tax is not further considered. It had been deleted from the PDD and excel sheet</p>	<p>By checking PDD version 2.3, Validation team confirmed pre – tax was appropriately applied. CAR is closed</p>

<p><b>CAR-20:</b> In the Common practice analysis, PDD version 1.0 excluded “Nam Tha 6” and “Ngoi Xan 1” projects because they are developed as CDM projects. However, by cross – checking with UNFCCC website, Validation did not found mentioned projects as CDM projects</p>	<p>6.z 6.e.g</p>	<p>Nam Tha 6 was registered as CDM project in the Group of Nam Tha Hydropower Project. For Ngoi Xan 1 project, the project also was registered as CDM project in the Ngoi Xan Hydropower Project. The information in the Common practice analysis has been clarified in the revised PDD.</p>	<p>In the PDD version 2.3, detail information of mentioned projects was provided. By cross – checking with UNFCCC website, Validation team confirmed that information is correct. CAR is closed</p>
<p><b>CAR-21:</b> In the Common practice analysis, sources to provide information of Na Loi hydropower project and Nam Mu hydropower project cannot substantiate the provided information in the PDD version 1.0</p>	<p>6.aa 6.e.g</p>	<p>The newest sources for Na Loi and Nam Mu have been updated into the PDD</p>	<p>By checking new sources in the PDD version 2.3, Validation team confirmed that sources are accessible and reliable and they substantiate that the Project is not Common practice in Vietnam. CAR is closed</p>

<p><b>CAR-22:</b> In the section B.5, PDD version 1.0 stated that the Project participants notified the proposed project activity to EB and Vietnam DNA on 21<sup>st</sup> Dec 2009. However, by cross – checking relevant documents, Validation team confirm that the notification was made on 27<sup>th</sup> Oct 2009</p>	6.a.b	The corrected information has been updated into the PDD	By checking PDD version 2.3, Validation team confirmed that the date was correctly revised. CAR is closed
<p><b>CAR-23:</b> The Feasibility Study Report (FSR) was revised and approved according to the change of installed capacity. However, the issuance and the approval of FSR are not available in the key milestones of the Project</p>	6.a.b	The issuance and the approval of FSR have been updated into the PDD	By checking PDD version 2.3, Validation team confirmed that the milestones of the Project were sufficiently described. CAR is closed
<p><b>CL-1:</b> Information of the distance of the transmission line is not available in the PDD version 1.0</p>	3.d	Information of the distance of the transmission line has been added in the PDD, version 2.3	By checking revised PDD and cross – checking with relevant record, Validation team confirmed that the transmission line's distance was accordingly provided and correct. CL is closed

<p><b>CL-2:</b> <math>\cos\phi</math> of the Generator is not available in the Technical Specifications of the Project</p>	<p>3.h</p>	<p><math>\cos\phi</math> of the Generator has been updated into the PDD</p>	<p>By checking relevant section in the PDD version 2.3, Validation team confirmed that parameters were fully provided. CL is closed</p>
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<p><b>CL-3:</b> In section E.1, PDD version 1.0 stated that "On 16th, 20th and 22nd of October 2009, a meeting between the project owner and the following representatives of the local people was held in order to consult local people on the social-economic and environment impacts of the proposed project in order to develop this project as a CDM activity". However, no substantiation of how the invitation was done</p>	<p>3.gg</p>	<p>One week before the stakeholders meetings regarding the proposed project, the stakeholders were informed about project by public radio and notices at the Ma Cooih and Ka Dang Communal People's Committee's offices and Thanh My Town People's Committee's office. At the same time they were invited to the official meetings with the project owner to provide their comments. On 16<sup>th</sup>, 20<sup>th</sup> and 22<sup>nd</sup> of October 2009, a meeting between the project owner and the following representatives of the local people was held in order to consult local people on the social-economic and environment impacts of the proposed project in order to develop this project as a CDM activity. The stakeholders could immediately raise their comments regarding the proposed project during the meeting or after the meeting by sending their comments directly to the local authorities and/or project owner within fifteen (15) working days. Finally, the project owner in co-operation with local authorities would work on and address the received comments.</p>	<p>By interviewing Local Communes and Local affected people, Validation team confirmed that local people in the communes were invited by the Project owner prior to publication of the Project in order to raise their comments on the Project. Local Communes and local people confirmed with Validation team that the Project owner had informed them about the Project 1 week before the invitation of meeting, The manner of invitation is confirmed as clear. CL is closed</p>
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<p><b>CL-4:</b> No supporting information to justify that the option I of Investment analysis (Simple cost analysis) is not applicable</p>	<p>6.l</p>	<p>Supporting information to justify that the Option I of Investment Analysis (Simple cost analysis) has been added in the PDD, version 2.3</p>	<p>By checking relevant document, Validation team confirmed that the Project will sell the generated electricity to Vietnamese national grid. Option I (Simple cost analysis) was correctly excluded. CL is closed</p>
<p><b>CL-5:</b> In the Sensitivity analysis PDD version 1.0, the statement to excluded total O&amp;M cost is not available</p>	<p>6.r 6.c.vv</p>	<p>The statement to exclude total O&amp;M cost has been added in the PDD, version 2.3</p>	<p>By checking PDD and excel calculation sheet, cross – checking with Vietnamese legislation, Validation team confirmed that O&amp;M costs are consistently excluded from Sensitivity analysis. CL is closed</p>



<p><b>CL-6:</b> In the Common practice, the justification of load factor of the Project is not available</p>	<p>6.aa 6.e.g</p>	<p>The justification of load factor of the Project has been added in the PDD, version 2.3</p>	<p>By checking revised PDD and cross – checking with provided approved FSR, Validation team confirmed that the load factor of the Project was correctly calculated. CL is closed</p>
<p><b>CL-7:</b> By interviewing the Project owner, the Project will connect to National grid via 22kV line for internal use, parallel with transmission line and diesel generator will be installed for emergency cases. But no information provided in the PDD version 1.0</p>	<p>3.mm</p>	<p>According to the newest information of project owner, they will not use 22kV line for internal use and will not install diesel generator for emergency case. The commitment of project has been submitted to the DOE.</p>	<p>By checking the commitment signed between Project owner and EVN, Validation team confirmed that no other line will be constructed for the Project, CL is confirmed to be closed</p>

## APPENDIX B: COMMENTS BY PARTIES, STAKEHOLDERS AND NGOS

According to the modalities for the Validation of CDM projects, the DOE shall make publicly available the project design document and receive, within 30 days, comments from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available.

BUREAU VERITAS CERTIFICATION published the project documents on the UNFCCC CDM website (<http://cdm.unfccc.int>) on 11/05/2011 and invited comments within 09/06/2011 by Parties, stakeholders and non-governmental organizations. Comments were received for the CDM project "Song Bung 6 hydropower project". The comments received for the said CDM project are compiled below in tabular format.

Sr. No.	Details of the commenter	Date of the comment	Comment [unedited]
1	Zhong Zhou Li, zhongzhouli8@gmail.com	23/05/2011	It is evident from the PDD that the values are consistent and it is definitely forged and cooked up values to show a non CDM project as a CDM project. What is this? DoE to check the Detailed Project Report and Feasibility Report which is submitted to the other agencies and Banks by Project owner and ensure that the values match with the DPR/FR submitted to DoE also. After careful study of PDD it is found that DPR/FR is in different versions made and submitted with different purposes to different agencies which is totally unacceptable, illegal and unethical. PP/Consultant may show some undertaking letter from bank manager to DoE stating that both DPR's are same. These kinds of letters should not be accepted and entertained by DoE. While collecting the DPR/FR from banks and other agencies, all DPR/FR pages should be counter signed by Banks and other agencies so that the real DPR/FR given to other parties by the PP/Consultant is same as the one submitted to DOE. In this particular project there is clear cut evidence that DPR/FR values are changed/fabricated mischievously and intentionally. This must be probed fully. DOE must take a written undertaking from the PP/Consultant about the list of parties to whom this DPR/FR is submitted and for what purposes. Then DOE should cross check with all the parties and confirm that the same DPR/FR is submitted to all the parties correctly without any changes. DOE must not accept any reports and undertakings from PP/Consultant. DOE must make independent evaluation and use totally different parties without informing the PP or Consultant to cross check the facts. DOE to write to the party who prepared the DPR/FR which is submitted to the banks and other agencies and the same is verified against the one submitted to the DOE by PP/Consultant. This project is a fabricated and fake CDM project and must be rejected by the DOE right away. DOE should not support this kind of projects otherwise CDM EB should suspend this DOE for at least one year.
2	Lawrance, lawrance_38@yahoo.com	23/05/2011	1) Layout of power transmission lines from the generation to the consumer with the metering system is not shown. It should include

Sr. No.	Details of the commenter	Date of the comment	Comment [unedited]
			<p>the distance of transmission lines. DOE has to check the meters are installed to monitor electricity generated, net electricity used in Bhutan, net electricity exported to India. Pls. clarify.</p> <p>2) The status of the construction &amp; commission of the project is not stated in the PDD.</p> <p>3) What is the basis of calculation for transmission loss, auxiliary consumption and transformer losses? What is the length of transmission line?</p> <p>4) The project is claimed to be run of river hydro project. So the calculation of reservoir is wrong. The criterion 3 is applicable only to pumped storage or accumulation hydro projects. What does reservoir refer to as per PP?</p> <p>5) The justification of opting out alternative 3 and alternative 4 is not justified adequately. It should be based on latest published data and figures. Refer B.4. Pls. clarify.</p> <p>6) The bilateral agreements, PPA with India are the documents, DOE to check thoroughly.</p> <p>7) Date of investment decision should be at the time of DPR preparation. So, the basis of the cost escalation factors at a later date for CDM consideration is not valid. Pls. clarify. Refer B5. Step 3a. (Investment barrier).</p> <p>8) How the CDM benefit will alleviate the technical barriers. As per additionality tool, if the barriers are not alleviated by CDM, then the project is not additional.</p> <p>9) Emission factor for state is not calculated. It should be made available to DOE to clearly validate this value. Emission factor for India is not as per "Tool for emission factor for the system".</p> <p>10) Electricity generated by the project, auxiliary consumption, transmission losses, transformer losses, net electricity exported to India, net electricity exported to the grid. These parameters to be monitored continuously and to be cross checked with sale receipts.</p> <p>11) The Meth mentions that if investment analysis option is used, apply the following:</p> <p>a) Apply an investment comparison analysis, as per Step 3 of the .Combined tool to identify the baseline scenario and demonstrate additionality., if more than one alternative is remaining after Step 2 and if the remaining alternatives include scenarios P1 and P3;</p> <p>b) Apply a benchmark analysis, as per Step 2b of the .Tool for the demonstration and assessment of additionality. If more than one alternative is remaining after Step 2 and if the remaining alternatives include scenarios P1 and P2.</p> <p>But PP failed to apply like this. Pls. clarify.</p> <p>12) PLF should be based on EB48 Annex 11 guideline which says The plant load factor provided to banks and/or equity financiers while applying the project activity for project financing, or to the government while applying the project activity for implementation approval;</p> <p>(b) The plant load factor determined by a third</p>

Sr. No.	Details of the commenter	Date of the comment	Comment [unedited]
			<p>party contracted by the project participants (e.g. an engineering company); But PDD doesn't demonstrate how PLF has been arrived at.</p> <p>13) Whether PLF includes machine shutdown, machine availability. Whether grid availability is accounted for in the calculation of gross generation. To my surprise, critical parameter like PLF is missing from the PDD. How DOE has allowed this.</p> <p>14) Common practice analysis should be based on EB 39 Annex 10 (Additionality tool). Each step of common practice analysis should be fulfilled as per tool.</p> <p>15) Emission reduction calculation should be based on EB 50 Annex 14 "Tool for emission factor for the electricity system.</p> <p>16) Whether only one set of main meter, check meter set is enough for three projects. The monitoring parameters need to be checked by DOE.</p> <p>17) The main meter and check meter technical parameters like accuracy level, make, etc. needs to be mentioned in the PDD.</p>

Validation team has already investigated according to comment received. By checking documents, which are legally approved by National organizations in Vietnam, as well as cross – checking with original records (contracts, agreements), Validation team confirmed that the Project satisfy CDM requirements.

Feasibility Study Report of the Project was established by Consultant and Investment on Hydropower Construction Joint Stock Company on 15<sup>th</sup> Apr 2010, Validation team already checked the original report and cross – checked the issued date, signed date, approved date appropriately. Subsequently, this was checked and approved by People Committee of Quang Nam Province. Validation team has checked original approval to confirm that the FSR and all assumptions in this FSR were approved legally in Vietnam

The layout of the Project was checked on – site and confirmed that it was correctly described in the PDD  
 The construction and commission of the Project was planned in the PDD and cross – checked as well as confirmed by Validation team. Transmission line information of the Project was provided sufficiently in the PDD. Emission factor was validated by the Validation team with the provision of sources from DNA of Vietnam

Decision evidences were provided to Validation team by the project owner. Validation team checked and confirmed that it is official decision from Project owner's management board and CDM benefit was appropriately considered

With investment analysis, Validation team already checked and confirmed all financial parameters were correctly applied. Project IRR without CDM revenue was confirmed lower than the selected benchmark WACC

Plant Load Factor was defined as calculated in the FSR, which is legally approved by Governmental organization. Validation team confirmed that the Plant load factor was adequately determined

Similar projects were sufficiently identified and discussed. According to reliable sources, Validation team confirmed that the Project is not common practice in Vietnam

Meter system (including main and backup meters) will be properly installed as validated. The accuracy class and meter information were adequately provided in the PDD

Bureau Veritas Certification thus requests registration of Song Bung 6 hydropower project as CDM project activity.