

Updating Small Scale Energy Efficiency Lighting Methodologies and New Exterior Lighting Methodology– Questions for public comments

Specific subjects for input would include:

Exterior Lighting Methodology

1. Does the methodology represent appropriate emissions calculation and monitoring approaches for small scale-scale methodologies including compliance with CDM modalities and procedures and requirements for determining the amount of real, additional, measurable and verifiable reductions in greenhouse gas emissions associated with exterior lighting systems.
2. Are the project definition and applicability conditions appropriate? Is it appropriate for the methodology to be applicable to be both street lighting and other exterior lighting applications, such as building outdoor security lighting?
3. Will the methodology be applicable to and support the development of both projects and POAs?
4. What changes are suggested to the methodology to make it more accurate and/or more usable?
5. Should there be a limit to the number of years allowed for crediting?
6. Can the methodology be used for new construction lighting projects and if so, what modifications are needed. How would baseline systems be determined?
7. How often (every year, every three years, etc.) should the savings determination be updated with field verification of system operation and/or analyses of operating hours?
8. How should measure life be determined?
9. What standards should the exterior lighting comply with, if any? Should a testing standard for how (and where, for example at ground level) illumination for exterior or street lamps are determined (for service level determination). Should such standards refer to photopic, scotopic, and mesopic requirements? Should the methodology reference certain standards for minimum lighting? Are such standards readily available in non annex I countries? Would the standards apply only at the time of installation or continuously? Lighting quality may also be an issue.
10. Are the indicated ex-ante default lamp operating hours appropriate? Can a default ex-post operating hours value be defined? If so, what sources should be used to determine such a value and what specifications must the project comply with for the value to be applicable?
11. Are there other suggestions and comments associated with the draft methodology?

Modifications to AMS-II.C

1. Should AMS-II.C be modified so to eliminate residential CFLs as an applicable measure, and thus require the use of only AMS-II.J for this type of measure?

Modifications to AMS-II.J

The following questions, if responded to, should include documentation of any recommendations.

1. Should AMS-II.J be modified to eliminate the net to gross (NTG) ratio?
2. What language should be added and/or modified so that AMS-II.J can be used for replacement of incandescent lamps with LEDs or other efficient lighting technologies?
3. Are there recent credible documentation on the residential operating hours of lamps in non annex I country households?. Such information could be used to confirm the conservativeness of the default value used in AMS-II.J or be used to update the value.
4. Are there recent credible documentation on the validity of the table in paragraph 2 for use in establishing minimum service levels for both CFL and LED replacements?
5. Is there language that can be used in AMS-II.J to ensure CFLs are of a high quality when used in CDM projects? Should the methodology prescribe minimum level of power factor and rated lifetime for the CFLs?
6. How can rated lifetime (50% failure) be reliably documented? Such language should be conservative, applicable to lamp operation and grid characteristics in non annex I countries, and able to be verified by a DOE. Such language should be based on credible documentation of current standards, practices, costs, etc. What procedures should be defined for constructing a mortality curve? Should more time be built in for lifetime tests by manufacturers or testing labs? Should such tests be done by independent labs? Such information could possibly be used for updating AMS-II.J paragraph 5.
7. Is there information on the costs and techniques for validating operation of household lamps with respect to their continued operation (monitoring)? Such information should be based on credible documentation. Such information could be used to update language in existing AMS-II.J paragraph 13.
8. Are the existing criteria for debundling check¹ adequate for the purpose for which it was developed in the context of distributed lighting energy efficiency activities or more in general distributed renewable energy generation or energy efficiency activities? If a modification is deemed necessary what would be criteria that may be revised or additionally applied?

¹ Intended to ensure a large scale project activity is broken into components and submitted as small scale project.