Call for public inputs on the "Guidelines for demonstrating additionality of renewable energy projects =<5 MW and energy efficiency projects with energy savings <=20 GWh per year"

Following are my comments on specific issues highlighted by EB. Due to shortage of time I will have comments on few points as highlighted by EB. But hope in due course of time for further revision of input EB will gives stakeholders an opportunity to have their valuable inputs.

Definition of communities and primary technologies;

type I project activities can only be considered under the primary energy technology to meet the basis purpose of the guideline to promote/easy CDM registration very small scale project activity. As these VSSC project category going to fulfill the direct sustainability criterion of CDM thereby resulting in net GHG mitigation. * Communities: In most of the LDCs/SIDs countries there is well defind major group of people/communities living in remote area using no-sustainable sources of energy to meet their energy demand. So, this guideline should promote the installation of such project among such communities (as defind by Host Country DNA, in their national constitution) to promote the clean and sustainable source of energy.

*Primary Technology: As of General Guidelines to SSC CDM methodologies

Application of the criteria implied in paragraph 2 (d) of the referred guidelines (EB 54, annex 15) for the host country DNAs and the Board to determine specific renewable energy technologies to be additional in the host country.

For different category of renewable energy Projects to be additional for a host country DNA, there are various sets of barrier faced by sub categories of renewable energy projects (Like Wind, hydro, Geothermal etc.) And they will differ from one another for a project specific barrier faced by that particular project activity. These barriers needed to be identified by DNA and accounted by EB for making renewable energy project to be additional (EB can refer the national communication submitted by national parties in this regard to set the host country wise and project specific wise barrier. Application of this criterion as referred in the guideline needed to further refined and defind to include the volume of projects in one go which can be easily registered at EB. Thereby directly resulting in net GHG reduction in short span of time.

Thanks: upesi_india@yahoo.co.in