Document: "Draft procedure for the development, revision, clarification and update of standardized baselines" (Ver. 01.0)
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1. Questions on the draft procedure

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#	Question	Comment	Proposed change	Assessment of comment (to be completed by UNFCCC secretariat)
1	Are the concepts and definitions of standardized baseline with methodology (SBM) and standardized baseline without methodology (SB) clear?	Yes	Please kindly see my proposed change of wording below in last page (since longer text)	
2	Is it beneficial to have both the concepts SBM and SB or should it be limited to SB only?	Yes	-	
3	What is your opinion on the clarity and user friendliness of the draft procedure?	Clear	Para 13d> letter of approval may be redundant since it is the DNA that submits the SB proposal anyway	

2. Any comment and proposal to the draft procedure

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#	Para No.	Line Number	Type of input ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
1			g	Given that SB development takes huge effort but once developed it would be used by any participant in the sector, there needs to be an incentive for the developer of SB. Especially in the case when SB development has not been grant funded, this needs key policy decision by UNFCCC to encourage innovation and market based economic sense of developing methodologies. Moreover, the task of revision and update will reasonably also likely to fall on the same developer. In such a context, there need to be a paragraph on mandatory project participation of the SB developer on projects applying an approved SB.	Provide a new Appendix 4. modalities for funding SB development and revision	

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*Proposed Change of Wording

1. A "standardized baseline with methodology" (SBM) is a standardized baseline, where

Case 1; when the SB is based on existing CDM Methodology

a section(s) in the selected approved CDM baseline and monitoring methodology (hereinafter referred to as an approved CDM methodology) or methodologies (in case multiple methodologies involved) for Additionality demonstration and/or baseline scenario establishment, and/or baseline emission estimation and/or Applicability has been standardized (using the procedures in Guideline and further simplification of baseline algorithms); while the other sections in the methodology (Algorithms for Project Emission and Leakage, Monitoring tables and Applicability) have been customized, with a view to estimating emission reduction under the specific contexts of the applicable geographical area. This type of SB, once approve, doesn't need referring to referenced stand alone CDM methodology (ies) or

Case 2; when the SB is not based on existing CDM Methodology

- a section(s) in the new baseline and monitoring methodology proposed together with the Standardized Baseline (hereinafter referred to as a methodology) for
 Additionality demonstration and/or baseline scenario establishment, and/or baseline emission estimation and/or Applicability has been standardized (using
 the procedures in Guideline and further simplification of algorithms); while the other sections of the SB methodology (Algorithms for Project Emission and
 Leakage, Monitoring tables and Applicability) have also been provided with a view to estimating emission reduction under the specific contexts of the
 applicable geographical area. This type of SB doesn't need referring to any stand alone CDM methodology (ies) from the outset.
- 2. A "standardized baseline without methodology" (SB) is a standardized baseline, where

Case 1; when the SB is based on existing CDM Methodology

• after selecting an Approved CDM Methodology, the Additionality, baseline scenario establishment and possibly baseline emission factor have been standardized (using the procedures in the Guideline and simplification of baseline algorithms) together with associated definitions, scope, applicability, entry into force and validity, for use in combination with an applicable approved CDM methodology(ies) with a view to directly applying algorithms in project

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emission and leakage towards estimating emission reduction under the specific contexts of the applicable geographical area as well as adapting the monitoring tables. This type of SB, once approve, still need referring to referenced stand alone CDM methodology (ies).

Case 2; when the SB is based on proposed new CDM Methodology

• after proposing a new CDM Methodology (as per Para 14 of the revised proposed guideline) to be approved separately in the conventional track, the Additionality, baseline scenario establishment and possibly baseline emission factor have been standardized (using the procedures in the Guideline and simplification of baseline algorithms) together with associated definitions, scope, applicability, entry into force and validity, for use in combination with an applicable approved CDM methodology (ies) with a view to directly applying algorithms in project emission and leakage towards estimating emission reduction under the specific contexts of the applicable geographical area as well as adapting the monitoring tables. This type of SB, once approve, still need referring to referenced (proposed) stand alone CDM methodology (ies).