



April 29, 2008

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To Mr. Rajesh Kumar Sethi
Chair, Executive Board of the Clean Development Mechanism

Dear Sir,

We are writing to you as project participants and members of the International Emissions Trading Association (IETA).

Regarding the Call for Public Comments on draft version 7 of the **Guidelines for completing the project design document (CDM-PDD), and the proposed new baseline and monitoring methodologies (CDM-NM)**, launched by the Board at its Thirty-Eighth Meeting, please find below our input:

- New text has been added in Section A.4.7, which might lead DOEs to ask for information which is confidential or proprietary. This text was added in the following paragraphs, where project participants must detail:
 - [Para 3:] *“The scope of activities/measures that are being implemented within the project activity, with a list of the equipment(s) and systems that will be installed and/or modified within the project activity”*;
 - [Para 5:] *“A list and the arrangement of the main manufacturing/production technologies, systems and equipments involved in the project. Include in the description: information about the age and average life span of the equipments, based on manufacturer’s specifications and country standards; and existing and forecast installed capacities, load factors and efficiencies. The monitoring equipments and their location in the systems is of particular interest”*.
 - [Para 7:] *“The types and levels of services (normally in terms of mass or energy flows) provided by the systems and equipments that are being modified and/or installed under the project activity and their relation, if any, to other manufacturing/production equipments and systems outside the project boundary. The types and levels of services provided by those manufacturing/production systems and equipments outside the project boundary may also constitute important parameters of the description. The description should*

clearly explain how the same types and levels of services provided by the project activity would have been provided in the baseline scenario”;

We feel that the text here is not sufficiently clear and might direct erroneously to request for proprietary/confidential information from project participants, which is superfluous and not needed to determine additionality, baselines or monitoring requirements.

We would like to kindly remind that, according to paragraph 6 of the CDM M&P, and paragraph 5 of the approved text of the Information note for Project Design Document, only information required to determine additionality, to describe the baseline methodology and its application, and to support an environmental impact assessment, **shall not be considered proprietary or confidential**.

We would therefore kindly request that the above mentioned text be appropriately clarified or modified in view of the restricted necessity to insert proprietary or confidential information in the PDD.

- Also, regarding SECTION D: Explanations / justifications to the proposed new baseline and monitoring methodology, we feel that the whole section could be easily eliminated because it tends to be repetitive and redundant of the information given in previous sections of the NM document; to increase the practicality of the text, the appropriate explanations, rationale, assumptions, treatment of uncertainty and conservativeness could be incorporated in the relevant sections of the document and provide only a summary at the beginning of the CDM-NM Form.

We hope our comments are useful to improve the document. We look forward to continue supporting your work and the continuous development of the CDM

Best regards,



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