

3 September 2008

The Chairman and the Members of the CDM Executive Board
c/o UNFCCC Secretariat
P. O. Box 260124
D-53153 Bonn
Germany

Dear Madam/Sir:

RE: Comments on Programme of Activities (PoA)

We welcome efforts made by the Executive Board to further improve Programme of Activities (PoA). To respond to call for public input, we would like to make comments on PoA as follows;

Use of multiple methodologies under PoA

According to "Guidance on the registration of project activities under a programme of activities as a single CDM project activity", all CPAs of a PoA shall apply the same approved baseline and monitoring methodology, involving one type of technology or set of interrelated measures in the same type of facility/installation/land. However, many energy efficiency PoAs require a broad range of energy efficient technologies, which single methodology cannot cover. Therefore, whereas only one methodology is allowed under the current guidance, the use of multiple approved methodologies should be allowed under the PoA.

Clarity on some sections in the PoA-DD CPA-DD forms

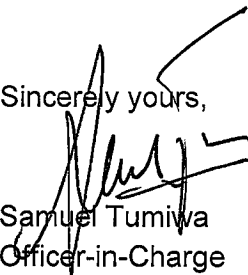
- In the form for PoA DD assessment of additionality of PoA is to be described in section A.4.3. This is understood, however, the assessment of additionality of typical CPA is also required to be detailed out in section E.5.1. Since the assessment of additionality will anyway be detailed out in all CPAs, why is it included in the PoA DD? The description of procedure and criteria to demonstrate additionality provided in the Section E.5.2 should be sufficient. We would like to request the EB to clarify this aspect and revise the template if necessary or provide guidance in the form.
- Can CPAs in one PoA have different crediting periods? This needs to be clarified.

Estimation of applicable fees

The current rules state that fees to be paid will be determined based on the CDM programme activities. However, at the time of registration it may be difficult to estimate fees, especially since CPAs could be added over 28 years. Also, there may be difference in estimated CER number. In some CPAs these could be less than 15,000 per annum but in others more. While the former type would not attract any registration fees, the latter ones would. Therefore, the EB is requested to clarify the issue.

We would greatly appreciate if the CDM Executive Board could consider above mentioned comments at the next meeting. Thank you.

Sincerely yours,



Samuel Tumiwa
Officer-in-Charge