

Beijing, 2008-06-10

UNFCCC
Secretariat
Martin-Luther-King-Strasse 8
D-53153 Bonn
Germany

Dear Members of the CDM Executive Board,

The following are Comments to Draft VVM (Version 05) for your consideration:

1. For the purpose of catalyzing and expanding CDM project in least developed countries with a weak basis of data and literature on the grid, **PLEASE** take into consideration of publishing conservative default value of baseline emission factor for countries or areas where information on the characteristics of the grid is not publicly available.
2. Paragraph 123 is suggested to be supplemented as follow:
“If the project activity start date is prior to the commencement of validation **or LOA application, whichever is earlier**, it shall be demonstrated that the incentive from the CDM was seriously considered in the decision to proceed with the project activity.”
3. Paragraph 140 is suggested to delete “**ongoing projects**” in common practice analysis for reasons that necessary data/information of ongoing projects are usually not accessible for PPs, which has been stipulated and clarified in the “Tool for the demonstration and assessment of additionality”(Version 05).
4. The procedure for deviation in the phase of verification is suggested to be simplified or put-off to the phase of issuance in that the monitoring plan in finalized PDD is hardly to be complied with in cases that CDM project activities are registered at its early stage of construction.

Yours faithfully

Hanergy CIS