9 April 2010

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: Public inputs on the small-scale energy efficient lighting methodologies and the solar water heating methodology

We welcome efforts made by the Executive Board to further improve small-scale energy efficient lighting methodologies and solar water heating methodology. With reference to this call for public input, the following response has been prepared:

Energy Efficient Lighting Methodologies

1. We think the proposed external lighting methodology AMS-II.x can be used for new construction and the baseline systems can be determined as the typical one in the region of the project activity at the time of the project activity. Since the street lighting are usually owned and managed by national/local government authority, the official records on historical application of the street lighting systems should be available for baseline determination.

2. Regarding paragraph 4 of the AMS-II.x, we noted that "Project lamps, used in the project luminaries, must have been tested and rated by their manufacturer or an independent body according to a relevant national or international testing standard". We welcome SSC-WG's allowance of lamp testing by manufacturers. One request we would like to make is to accept testing of the lamps which are not actually supplied for the project activity but have the same specifications as the bulbs to be used for the project activity. This is because lamp testing would take a few years to complete and it may delay the project implementation if testing of the lamps used by the project activity is required. Testing of lamps manufactured in early product batches should be accepted. We suggest that the same condition should be applied to AMS-II.J.

3. Regarding foot note 4 of AMS-II.x, we suggest to mandate the on-site verification or witnessing by DNA staff or local environmental officials while the DOE needs to check the proper documentation of lamp destruction during CDM verification. This is because the DOE may not have been appointed for CDM verification at the time when the destruction of lamps took place. We suggest that the same condition should be applied to AMS-II.J.

4. We think that in order to avoid situation in which two methodologies arrive at different emission reductions from the same project, the methodology AMS-II.C should be modified so that residential CFLs are not covered under its applicability.

5. Regarding paragraph 5 of AMS-II.J, we suggest that prescription of minimum level of power factor should be deferred since high power factor is not urgent priority. To ensure high quality of CFLs, we suggest to introduce the parameters of Efficacy and Lumen Maintenance, which will be stipulated in the following way:

- **Efficacy:** (Reference: http://www.efficientlighting.net/doc/20060913.pdf)

Input Power of Lamp (W)	Initial Luminous Efficacy (lm/W)					
	Correlated Color Temperature (CCT)					
	6500K	5000K	4000K	3500K	3000K	2700K
≥ 5 to <9	46		50			
≥ 9 to <15	52		55			
≥ 15 to <25	57		60			
≥ 25 to ≤ 60	62		65			

- **Lumen Maintenance:** The luminous flux of the lamp must be lamp must be ≥ 80% of initial levels at 40% of model's rated lifetime. Luminous flux shall be measured according to IEC 60969.

6. We fully support the point made in SSC_391 that the same exemption from the debundling test that applies to CPAs under a PoA is needed and should apply to individual SSC project activities, namely if each of the independent subsystems/measures included in the CPA of a PoA (or in an SSC project activity) is no greater than 1% of the small scale thresholds defined by the methodology applied, then that CPA of PoA (SSC project activity) is exempted from performing de-bundling check. There are still significant barriers to PoA, so we need to be able to rely on SSC project activities as the mode of implementing many project types important for sustainable development that are dependent on this ruling.

Solar Water Heating Methodology

7. The computer simulation method suggested for calculating ER in paragraph 9 (a) of AMS-I.x is likely to lead to misuse and overestimation.

8. A number of solar hot water systems may have been installed many years ago where there may be huge subsidies. Hence, household systems may have been installed at very cheap rate at that time. 10 to 20 years later, there is a possibility that none of the earlier benefits are available to the project proponent. In such cases, the project proponent may be tempted to put up low initial cost solutions like electric or gas heating. It may be advisable to give CDM benefits to the customers even if there is a replacement of old solar system. Method of appropriate baseline determination for such cases should be mentioned. This may have bearing on E+ / E- policies of the nation also.

9. Title of the methodology "Solar thermal domestic water heating system" may create confusion regarding its applicability for commercial operation. For clarity, the title may be revised to "Solar thermal small water heating system".

10. Paragraphs 5 and 6 cover generic text regarding procedure for baseline emission calculation. For simplicity and better clarity of project proponent, standard formula for baseline emission covering assumptions to be considered for major parameter should be introduced.

11. Selection procedure for "baseline water heating system" should be added for uniformity and proper estimation of baseline emissions.

12. There is a need to mention about how the use of renewable energy fuel, if any, will be considered in the baseline calculations.

13. On paragraph 14, recording of all required data hourly will be difficult and economically not feasible in small SDWH system.

We would greatly appreciate if the CDM Executive Board could consider above mentioned inputs.

Sincerely yours,

Jiwan Acharya
Climate Change Specialist (Energy)
Sustainable Infrastructure Division
Regional and Sustainable Development Department
Asian Development Bank
Tel (632) 632-6207, Fax (632) 636 2198
jacharya@adb.org
www.adb.org