Chairman and Members of the CDM Executive Board
Mr. Clifford Mahlung
Chairman
UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D 53153 Bonn
Germany

12th April, 2010

Dear Mr Mahlung,

Honourable members of the CDM Executive Board

RE: Call for public inputs: Small-scale energy efficient lighting and solar water heating methodologies

I would like to thank the Executive Board for the call for public input, and will make comment on one aspect of this call: approved small-scale methodologies for energy efficient residential lighting.

Having been involved in the development of AMS-II.J as part of an informal expert working group run by the World Bank's Carbon Finance Unit, and having worked on the development of the first registered PoA (CUIDEMOS Mexico) which uses AMS-II.C, I am very familiar with the methodological issues contained in each. I also commend the Board for its ongoing efforts to continue to refine these methodologies in order to facilitate the scaling up of demand side energy efficiency projects under the CDM.

I draw the attention of the Executive Board to the public submission made by the Project Developer Forum on this topic. RAMP Carbon supports the submission of the PDF, and has provided some brief, complimentary comments below.

Modifications to AMS-II.C

1. Should AMS-II.C be modified so to eliminate residential CFLs as an applicable measure, and thus require the use of only AMS-II.J for this type of measure?

In short, no. The two methodologies offer fundamentally different approaches to monitoring, both of which have merit, and it should be left to project proponents to choose the appropriate approach depending on their project design, technical capabilities and financial resources:

- AMS-II.C requires ongoing metering of lighting in order to determine actual hours of use. This monitoring requirement is complex and expensive, however, offers the project proponent the opportunity to claim more CERs for their efficient lighting project activity.
- AMS-II.J offers a simplified monitoring approach, however, as a trade-off for this takes a conservative approach to the determination of energy savings and CERs issued.

Both methodologies offer appropriate monitoring approaches for energy efficient lighting in residential settings. The choice of methodology will depend on the unique situation of each project developer, and

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as such it would be detrimental for the Executive Board to reduce the options open to developers by requiring the use of only AMS-II.J for efficient lighting projects.

Modifications to AMS-II.J

5. Is there language that can be used in AMS-II.J to ensure CFLs are of a high quality when used in CDM projects? Should the methodology prescribe minimum level of power factor and rated lifetime for the CFLs?

6. How can rated lifetime (50% failure) be reliably documented? What procedures should be defined for constructing a mortality curve?

Rated lifetime is typically defined as a manufacturer-declared value (refer, for example, to the most widely used standard for testing lamp performance, IEC 60969). There should be therefore no justification for this value to be further documented. Rated life claims are not test results per se, but in the case of reputable manufacturers represent conservative claims that include a comfortable buffer over test values, based on experience and typically assigned before full life testing is completed. It should be left to the project proponents to procure lamps with performance characteristics and warranties suitable for their project activity.

8. Are the existing criteria for debundling check1 adequate for the purpose for which it was developed in the context of distributed lighting energy efficiency activities or more in general distributed renewable energy generation or energy efficiency activities? If a

We support the proposal made in SSC_391 that the same exemption from the debundling test that applies to CPAs under a PoA should apply to individual SSC project activities; namely if each of the independent subsystems/measures included in a SSC project activity is no greater than 1% of the small scale thresholds defined by the methodology applied, then that SSC project activity is exempted from performing the de-bundling check.

Thank you for the opportunity to comment on these methodologies and for your ongoing efforts to scale-up energy efficient lighting under the CDM.

Your Sincerely

Philip Cohn

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