C-Quest Capital LCC

Response to Call for Public Comments

Thursday, April 08, 2010

CQC supports the proposed revisions to AMS II.C and AMS I.J proposed in Request for Revision SSC 379.

With regards to the specific inputs the EB seeks:

**Modifications to AMS-II.J**

The following questions, if responded to, should include documentation of any recommendations.

1. Should AMS-II.J be modified to eliminate the net to gross (NTG) ratio?

We support the elimination of the NTG ratio.

2. What language should be added and/or modified so that AMS-II.J can be used for replacement of incandescent lamps with LEDs or other efficient lighting technologies?

The term ‘CFL’ should be replaced throughout the methodology with a broader term indicating an alternate, more efficient lighting technology (that would include, *inter alia*, LEDs) that would be a direct retrofit in the existing lighting fixture, without the use of any additional external circuitry.

4. Are there recent credible documentation on the validity of the table in paragraph 2 for use in establishing minimum service levels for both CFL and LED replacements?

Most non-Annex I countries have lumen output standards for CFLs, and credible documentation is available from either national or international test labs. This documentation can be used for establishing minimum service levels for CFLs. No such documentation exists for LEDs at this time.

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?

The methodology should not prescribe certain minimum quality levels for CFLs. The methodology should be consistent with other methodologies in assessing the emissions reduced through the technology that project developers deem it most appropriate to apply.

6. How can rated lifetime (50% failure) be reliably documented? Such language should be conservative, applicable to lamp operation and grid characteristics in non annex I countries, and able to be verified by a DOE*.* Such language should be based on credible documentation of current standards, practices, costs, etc*.* What procedures should be defined for constructing a mortality curve? Should more time built in for lifetime tests by manufactures or testing labs? Should such tests be done by independent labs? Such information could possibly be used for updating AMS-II.J paragraph 5.

We refer to Request for Revision SSC 379, and support the suggestions contained therein.