

Comments on revised ACM0016 methodology

I. SOURCE, DEFINITIONS AND APPLICABILITY

Definitions

- Using “urban agglomeration” is preferable to use “Lager Urban Zone (LUZ)”, because the most of cities to be applied of the methodology are out of Europe.

II. BASELINE METHODOLOGY

Procedure for the demonstration of additionality

Step2: Assessment of common practice at the level of the LUZ

- Paratransit should be incorporated into a public transport category. There are some cities in developing countries where the majority of non-private traffic are shared by paratransit. The demand for paratransit are going to change into MRTS.

Step 3: Financial assessment at project level

- Threshold of financial additionality of 30% is too high to realize CDM projects. I examine the revenues from CERs of a studying project. In the case the annual O&M costs of MRTS are estimated US\$ 40 million and the emission reductions are 100,000 tCO2/year which are equivalent to US\$ 1.5 million revenue or 4.5% of annual O&M costs.

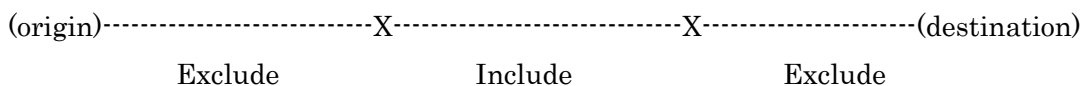
Project Emissions

Determination of indirect project emissions (IPEy)

- As shown in the following figure, the indirect project emissions are equal to or less than the corresponding baseline emissions. Therefore the calculation of indirect project emissions are not required subject to adjustment of baseline emissions excluding corresponding baseline emissions.

BASELINE

Bus(B), Taxi(T), passenger car(C), motorbike(M)



PROJECT

Walk,Bicycle,(B/T/C/M) MRTS Walk,Bicycle,(B/T/C/M)

