

September 7, 2011

Comments on the draft revised methodology ACM0016 "Baseline Methodology for Mass Rapid Transit Projects"

In response to the call for public inputs on the draft revised methodology ACM0016, Climate Consulting, LLC submits following comments for the CDM Executive Board's consideration.

(i) Basis of the criteria provided in "Step 3: Financial assessment at project level"

- The draft provide a new criteria for the assessment of addtionailty of the proposed projects. It is stated in page 10 that:

For this purpose, the project participants shall assess whether the revenues from CERs per year are equal to or more than 30% (for railbased systems) or 60% (for bus-based systems) of the total operating and maintenance costs of the project MRTS.

- It is straight-forward and simple to provide these criteria, and it would be much easier for project participants to demonstrate additionality than the previous version.
- However, the criteria, 30% and 60%, are not very clear for us. We highly appreciate that you will provide information on how and why these values are set. Or some example would be better shown. Also would like to know the details of Table3, for example, O&M costs for stations are included or not.
- Our simple calculations for MRTS in South East Asian countries show that the rate, the revenue from CERs/Total O&M costs, will be far less than 10%. It is suppose that if the criteria 30% will be approved, many of the MRTS projects in developing countries can not be realized as CDM.
- Again, we would like to know the basis of the criteria 30% and 60%.

(ii) The methodology to determine "the share of trips" in "Step 2: Assessment of common practice at the level of the LUZ"

- The method to determine "the share of trips" is not shown in this context. It would be more clear to describe how to estimate the trips or to provide guidance of what kind of data should be used to estimate "the share of trips".

Climate Consulting, LLC believes that the comments above will encourage further developments of the draft.

Thank you for your consideration.

Sincerely yours,

Yasuki Shirakawa

President

Climate Consulting, LLC