<table>
<tr><td colspan="2" align="center">CDM: Proposed new small scale methodology - public comment form (version 01)
(Available electronically on the UNFCCC CDM website. The layout may differ from this hardcopy form)</td></tr>
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Related small scale submission number	AMS III.AZ. Energy efficiency and/or energy supply projects in commercial buildings

Based on an assessment of the proposed small scale methodology and its application in sections A to C of the draft CDM-SSC-PDD, provide your comments to the proposed new small scale methodology. Please indicate the sections or issues to which your comments refer.

Thanks for the great efforts in developing a methodology which at last addresses the efficiency improvements in the building as the whole. I have the following comments to which could improve the approach of the methodology:

1. The methodology doesn't give incentive or consider emission reductions for new construction buildings if the project scenario building has already incorporated best solar orientation, external sun shading, and an articulated façade to reduce the building heating, cooling, and lighting loads based on passive design approaches, as the Baseline Building must also include the same basic configurations.

2. While estimating the Baseline emissions for the new construction projects, according to Paragraph 17 (c) when there is a legally mandated code on energy performance of buildings, if the Baseline Emissions calculated using computerized simulation tool (BE_{model}) is higher than mandated code on energy performance, then the baseline emissions should be based on the mandated code (BE_{code}) not based on the simulation tool results as proposed in the methodology. If the BE_{model} is higher than BE_{code} then the building is not complying with the local building regulation which is the baseline scenario. So in this case BE_{code} should be the baseline emission scenario. If the BE_{model} is lower than BE_{code} then BE_{model} could be the baseline emission scenario to add conservativeness to emission reduction estimation rather than having BE_{code} as the baseline emission scenario as suggested by the proposed methodology.

Information to be completed by the secretariat

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