

The Chairman and the Members of the CDM Executive Board
c/o UNFCCC Secretariat
P. O. Box 260124
D-53153 Bonn, Germany

Ref.: Call for input on “Issues included in the annotated agenda of the sixty-seventh meeting of the CDM Executive Board and its annexes (23-30 April 2012, 24:00 GMT)”

April 30, 2012

Dear Members of the CDM Executive Board and UNFCCC Secretariat,

The below inputs are in reference to the call for public inputs for "Issues included in the annotated agenda of the sixty-seventh meeting of the CDM Executive Board and its annexes". The comments made are submitted in response to the call for public inputs made at EB 66 on the draft version of methodology SSC-III.AZ "Energy efficiency and/or energy supply projects in commercial buildings" and in response to the minutes of UNFCCC secretariat to the 7th Telefon Conference with DOEs/AIES and AEs.

First of all we would like to express our appreciation to have the opportunity to attend the above Telefon Conferences and have the opportunity to give our feedback to Calls for Public Inputs also on other issues as Applicant Entity from a developing country.

Please find below our inputs:

- **Draft version of methodology SSC-III.AZ “Energy efficiency and/or energy supply projects in commercial buildings”**

As the final version of methodology SSC-III.AZ “Energy efficiency and/or energy supply projects in commercial buildings” has not been released yet and is also not on the agenda of EB 67, we would like to use the opportunity to ask for further clarification as follows:

The draft methodology mentions under Step 2:

“The computer simulation results for the project building is compared to the actual energy consumption first 12 months of building (full) operation, and the whole building model is calibrated following the “Whole Building Calibrated Simulation” path in ASHRAE Guideline 14-2002.”

Would you mind please clarifying why the methodology refers to a standard that might not be used worldwide and in addition is not public available and need to be purchased.

From our view the methodology should be open and extended besides of ASHRAE Guideline 14-2002, eQUEST, EnergyPlus also to other standards and tools like relevant European standards under development, e.g. prEN 16247-2 “Energy audits – Part 2: Buildings”, other internationally recognized and proven standards like IPMVP (International Performance Measurement and Verification Protocol), which is public available or relevant local standards in CDM host countries incl. LDCs.

Anyhow, under consideration of the large untapped greenhouse gas emission reduction potentials in commercial buildings and the related life-cycles, we welcome the efforts under leadership of the SSC-WG for creating the above methodology and hope the final version will be approved and released as soon as possible in order to be applied.

- **Validation/verification report forms and guidelines**

Thanks for the clarification on this issue in the minutes of the 7th Telefon Conference. May we ask, if there will be a call for public input launched on the draft documents prior to EB 68 ? Moreover we would like to ask, if the DOEs will be requested to amend their relevant documents according to VVS and PS before the release of the final documents by UNFCCC CDM EB ? We have raised this question, as it seems that this issue is also not on the current agenda of EB 67, but might be important for DOEs.

Thanking for your kind attention

We will be pleased to provide further input at your request

Yours faithfully

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