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## **Comment on the Performance Penetration Curve**

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We fully recognized that the standardized baseline in the guideline is, when specific clean technologies are defined in the positive list as eligible projects, instead of having to demonstrate additionality, such projects can be determined as eligible projects to reductions in CO<sub>2</sub> emissions. However, we have the following concerns on the PPC:

### 1) Difficulty of data collections

Since it is almost impossible to collect the site data to develop the PPC in each partner country due to national anti-trust regulation, a positive technologies list is not defined by using the guideline. In addition, it is completely impossible to collect any financial cost information due to the same reason.

### 2) Various type of cement

It seems considered that cement is uniform commodity but there are many type of cement such as Portland cement (Ordinary, Moderate, High-early Strength, Low heat and Sulfate-resistant) and Blended Cement (Blast furnace slug, Fly ash and Pozzolan) and others(Eco-cement). Therefore, various PPCs have to be developed for each type of cement in the county.

Accordingly, the positive clean technologies should be defined by alternative and more practical measure instead of the development of the PPC from the site data. One of our suggestions is to define them by referring to the cement technology roadmap developed by the WBCSD CSI and the IEA in 2009 or a regional/country technology roadmap in the cement industry to be published.