

CDM Executive Board  
Martin-Luther-King-Strasse 8  
53175 Bonn  
Germany

Date: 21 Dec 2012

Subject: Call for input on the draft new methodology SSC-II.R "Energy efficiency space heating measures for residential buildings"

Honourable members of the CDM Executive Board,  
Dear members of the SSC WG,

I would like to thank you for the opportunity to provide inputs on the proposed new small scale methodology AMS-II.R. There are already projects in the CDM pipeline that fall under this scope, so the approval of this methodology may bring about more projects. However, these current projects are trying / have tried to use a combination of methodologies AMS-II.E and AMS-II.G, which should be accepted as adequately covering the issues. These two methodologies are perfectly compatible, and this new proposed methodology is effectively their combination. Indeed, there is very little information that is not directly copied from these existing methodologies.

#### *Applicability*

The applicability should not be restricted to rural areas only. There is no fundamental difference in the application of the methodology to rural or urban areas. While the levels of baseline emissions may vary, that is easily addressed in the baseline and emission reduction calculations.

As the energy savings targetted in this methodology are thermal, it may be clarified in para 9 that the aggregate energy savings shall not exceed 180 GWh<sub>th</sub> per year.

#### *Baseline determination*

The restriction to just two options for the baseline determination is not welcomed. Detailed surveys already exist in many places, presenting all information required for the baseline determination. Duplicating work by demanding a separate baseline measurement campaign or using a control group is increasing costs, delaying action and potentially self destructive. Existing surveys should be accepted. The projects already in the pipeline, that could also be covered by this new methodology, have such existing data which could be used for an accurate baseline.

Project ideas are often born out of the results from existing data. To have to carry out a baseline measurement campaign delays action by project proponents, and therefore the sustainable development impact of the proposed projects is diminished.

The use of a control group is also likely to be problematic. Once a project is set up, promoting and making available the efficiency measures, and with the carbon revenue subsidising them, these measures would be attractive to households in the control group too. It would be difficult, if not impossible, to deny households in the control group the benefits of the efficiency measures promoted

by the CDM project. Therefore, the control group is likely to decline in size, and therefore the project to self-destruct by not achieving the required size under the Sampling Standard.

Indeed, this would therefore be against the objective of the CDM by withholding sustainable development benefits from a group of households involved in the project. Additionally, many project proponents of this type of project are NGOs/charities or linked to charities, and the withholding of the project benefits from some households would be against their objectives too.

*Additional point*

In the procedural background an incorrect title of AMS-II.E is given.

The new proposed methodology AMS-II.R is welcomed if the baseline determination is allowed to utilise existing surveys/data for the baseline, of course assuming such data includes all the baseline energy use that is targetted by the project, in order to minimise unnecessary duplication, delays and cost. It would also be possible to approve the combination of the two underlying methodologies AMS-II.E and AMS-II.G, assuming that the baseline data includes all the energy use that is targetted by the project.

Yours sincerely,

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