

TABLE FOR COMMENTS

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#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
1	3 (a)		ge	<p>Instead of excluding any use of heat for industrial production processes, this applicability condition can be limited to for instance 20% of the total heat supplied going to industrial processes.</p> <p>This would not affect the environmental integrity of real project activities. In light of only 11 registered projects, it is an opportunity to render AM0058 better usable. The complete exclusion of other heat uses than residential heating can be a factor why all 18 submitted AM0058-using projects are in China, and are quite large.</p>		
2	17 (b)		ge	<p>The formulation in AM0058 vs 3.1 was (3) and (4) on page 6 and seems equivalent to the new 17 (b).</p> <p>An improvement in terms of simplification would be to leave out this scenario requirement entirely because there is no country, size, technology or economic situation where heat-only boilers could be a relevant alternative for additionality considerations. Requiring this scenario seems warranted only following formalistic logic and not empirically informed (no economics, nor engineering realism).</p>		
3	17 (c)		ge	<p>The formulation in vs 3.1 was (1.b) on page 6 and seems equivalent of 17 (c) because it keeps the unspecificity of the “different configurations” that shall be considered.</p> <p>This unspecificity (vagueness) seems avoidable by fixing what share of heat-only boilers shall be included among scenarios to be considered.</p>		

Template for comments

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4	29(b) and 30(b)		ge	The Appendix 1 in vs 3.1 had nine different defaults for coal fired boilers (from a variety of sources), while the new Tool09 for baseline efficiency from MP67 has only one for “old coal fired boilers” with 80%. This is a significant increase in conservativeness for those cases when options A to E of this Tool cannot be used.		