

Please find below our observations on [Tool to calculate emission factor of electricity system” to include guidance on small isolated grid systems and transmission constraints](#)

- We commend the Meth Panel efforts to simplify grid emission factor calculations for SIDs/LDCs and options proposed to simplify requirements are in right direction.
- Though we agree with suggestions made by the panel, the assumptions made with respect to efficiencies of DG sets are not reflecting the reality on the group, especially in SSA. Though this may be true to few countries, mainly in Caribbean, we are not sure their applicability to African countries as the DG sets still on the field are very inefficient and with higher emission factors. Considering this, it would be helpful if the values mentioned in Table 1 of AMS I.F or I.D still apply to these countries until more information on them is available. This usage can be made optional for project developers and leave it to them to decide on whether to use these default values (Table 1 of AMS I.F) or project specific information.
- The suggestions to measure transmission constraints in a network seem very useful but need to consider the data constraints in countries that this is targeting and hence any such data related constraints will limit the usage of the proposal. Considering this, we suggest that the Panel also evaluates other options for measuring transmission constraints using pricing of electricity, operation of power plants connected to the network etc. It is also important to exclude possibility of transmission constraints due to reliability, security aspects.

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