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** | **Para 1** | **1** | **Mandate** | **Is the mandate to replace the whole of Para 11? The whole of Para 11 (C)? Or is it to address the specific question of removing** | The work should stick to the mandate to “explore options for replacing the unit size criterion in the positive list (i.e. provision in paragraph 11 (c) of Tool21) with an expanded positive list of technologies in the Tool21 that includes specific distributed unit technologies that would provide services to households/communities/small- and medium sized enterprises (SMEs) “  **NB: recommendation to remove the whole of Para 11 is not mandated.** |  |
| **2** | **2** | **2.4b** | **Coverage of mandate** | The positive lists facilitate the development of CDM project activities and programme of activities particularly involving distributed energy technologies that would provide services to households/communities/small- and medium sized enterprises.  The proposed approach selectively endorsed few technologies and eliminates other technologies that provide services to households/communities/small- and medium sized enterprises citing “The technologies whose Additionality is already addressed in specific methodologies were removed from the list”  On the contrary we can imagine it is contradicting to suggest for the eliminated technologies to use provisions in the SSC methodology while eliminating the very basis of 1% provision from the methodology itself by restricting it to selected few other technologies. For example efficient vehicles cannot have a simplified provision in the SSC tool once 11C is removed, since all other sub elements of Para 11 talk about electricity/energy provision only. | There are two options to address this   1. State that all distributed technologies that provide services to households/communities/small- and medium sized enterprises in the proposed positive list under 11c  **or** 2. Maintain the provision in the methodology as it is |  |
| **3** | **Para 10** |  | **correction** | States “it is found that the simplified Additionality provisions are available in relevant methodologies covering specific DUTs such as efficient lightings, efficient vehicles, and waste water treatment. “  However if you see the methodologies that may not be true. For example if we see AMS IIIC (distributed Vehicles), it invites you to use the small scale methodology. The small scale methodology caters for such technologies only under 11C. It is being proposed to restrict 11C to other technologies. | **Apply the proposal above** |  |
| **4** | **Para 2** |  |  | Proposal states “EB 94 also agreed not to merge the methodological tools "TOOL19: Demonstration of Additionality of micro scale project activities" and "TOOL21: Demonstration of Additionality of small-scale project activities".  However merger is different from enhancing clarity. The SSC Additionality tool, while having a flow chart for micro scale demonstration adjacent to a SSC demonstration, it doesn’t have a text in the main body of the tool that directs users to apply the micro scale threshold or flow chart when it applies to their case. | Include under Para 11 that users can use the micro scale threshold or flow chart when it applies to their case. This may also be used as an alternative for addressing the concern above. |  |
| **5** | **Para 49** |  |  | It is proposed to include provision [5%] [10%] [20%] participation in the stock in use by end users for specific distributed unit technologies | We recommend 5% as the most reasonable penetration value since applying 10 % for each specific technology is too much for automaticity and 20% is a common practice range. It doesn’t seem comfortable to recommend to remove a 1% unit provision and allow a 10% penetration. |  |
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