Template for comments

Date:	Document: CDM-MP76-A06

TABLE FOR COMMENTS

Name of submitter: Project Developer Forum Ltd.

Affiliated organization of the submitter (if any): _____

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0	1	2	3	4	5	6
#	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	28 (a)	11	te	The document proposes to exclude "Solar photovoltaic technologies" from the "Simplified procedure to demonstrate additionality" (see section 5.3.1 on page 14 of the CDM-MP76-A06 - Draft Large-scale Consolidated Methodology: ACM0002: Grid-connected electricity generation from renewable sources Version 19.0). However, we demand to not implement this exclusion as this would delay the adoption and implementation of solar photovoltaic technologies in countries where this technology is not yet well established. The fact that the current status of regulation only benefits countries with the need to support the adoption of this technologies is already warranted by paragraph 29.(a), which limits the benefits of the "Simplified procedure to demonstrate additionality" to countries where "*the percentage share of total installed capacity of the specific technology in the total installed grid connected power generation capacity in the host country is equal to or less than two per cent*". To further substantiate our request, we would like to offer the following arguments: While the proposed exclusion of "Solar photovoltaic technologies" from the "Simplified procedure to demonstrate additionality" may be motivated by its observed reduction in Levelized Cost of Energy, we would like to present the following facts: • Due to the intermitting nature of Solar PV, it is not comparable to other technologies. Its lower value in	Do not exclude the "Solar photovoltaic technologies" from the "Simplified procedure to demonstrate additionality", but to keep it unaltered together with other listed technologies.	

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				terms of constant energy generation and dispatchability needs to be compensated. • The countries with less than 2% of Solar PV almost certainly do not have domestic production of solar panels and will need to import the technology, generating an impact on the countries' trade balances. • LCOE is very susceptible to capital costs and countries where such technologies have not yet been adopted generally suffer from high capital costs and lack of access to capital. • Solar PV requires large upfront capital expenditures, usually in foreign currencies, that generate exposure to exchange rate fluctuations and increase capital costs. In summary, the proposed change would negatively impact countries that are facing the most significant challenges to adopt the technology, and that did not yet have the chance to build the basic enabling environment for its implementation. Therefore, the proposed changes are in conflict with the objective to facilitate and accelerate the broad and equitable adoption of transformational technologies by all parties.		

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2	31	27 - 32	te	The document is proposing to exclude paragraph 31, which states the following: "*The positive list of technologies indicated in paragraph 28 above is valid for one year from the date of entry into force of version 18.0 of ACM0002 on 26 April 2018; the Board may reassess the validity of these simplified procedures and extend or update them if needed. Any update of the simplified procedures does not affect the projects that request registration as a CDM project activity or a programme of activities by 25 April 2019 and apply the simplified procedures contained in version 18.0 of ACM0002.*" However, we demand to not implement this exclusion as it sets a precedent of retroactive changes that impact projects that have been developed on the basis of existing rules and validity periods. Moreover, in the interest of equity among parties, we believe that the "Simplified procedure to demonstrate additionality" should be available to all parties up to the established limitation. The proposed changes establish a precedent for "First Come first Serve" that leaves weaker parties in respect to resources and knowledge behind and thus damages the equity of the CDM. However, we recommend that the abovementioned paragraph is not only maintained, but to extend the positive list validity from one to two or three years instead, in order to avoid constant changes in the rule. In addition, we understand that all the remaining provisions of such paragraph are important and must be kept and adjusted, i.e. that the Board may reassess the validity of these simplified procedures and extend or update them if needed and that any updates of the simplified procedures ~~does~~ *should* not affect the projects that request registration as a CDM project activity or a programme of activities ~~by 25 April 2019 and~~ that apply the simplified procedures contained in <u>previous</u> versions *~~18.0~~* of ACM0002.	Do not exclude paragraph 31, but to adjust it and to extend the positive list validity from one to two or three years instead in order to avoid constant changes in the rule.	

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