TABLE FOR COMMENTS

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| **0** | **1** | **2** | **3** | **4** | **5** | **6** |
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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** | **Table 5 Results** | **82** | **ge** | **Results**The latest proposed fNRB values differ significantly from the previously approved CDM defaults and the Q3 2023 MoFUSS output. For example, the current valid fNRB approved by CDM EB for Myanmar is 0.615 with validity till 22/12/2025, higher than the latest proposed value.  | The variations on fNRB value reflects the need for further and boarder survey before final decisions. We propose a third round of public consultation on the fNRB values. |  |
| **2** | **NA** | **NA** | **ge** | **Country feedback and data releasement**As per current review period and procedure, neither the model nor the data inputs have been sufficiently validated by Designated National Authorities (DNAs) due to the limited timeframe available for analysis.The current version is releasing the data and fNRB for 72 countries in Table 5. The sufficiency, availability, accuracy, and progress of communications with Designated National Authorities (DNAs) may vary on country specifically. | The latest MoFUSS model and proposed fNRB value, should be fully discussed and cross checked with Designated National Authorities (DNAs) as per their available input data, especially for those countries had submitted fNRB to CDM EB previously. Procedures to call for input from Designated National Authorities (DNAs) should be set up with regard to the model as well as data inputs.Releasing the fNRB value by batches as per progress and data availability for each country, so that the values will be fully validated and cross-checked with Designated National Authorities (DNAs), and the feedback from other stakeholders for sufficient inputs thoroughly and scientifically for each country. | **NA** |
| **3** | **NA** | **NA** | **ge** | **Data Inputs / Results**The latest report reveals several local and national variations that must be considered and researched to accurately understand fNRB values. Also mentioned, MoFuSS is designed to use localized data; however, it was not practical or possible to use local or project-specific data when modelling at this scale.fNRB should be based on local level actual rather than country level assumptions otherwise it’s unviable and won’t attract the necessary private finance. | Local and national variations should be incorporated into the results before they are adopted as default values.UNFCCC should commission local or regional studies to incorporate localized inputs and assumptions.Only after integrating these local inputs into the MoFuSS model should default values be approved by the UNFCCC. |  |