Call for input on the draft revised methodology AM0031 "Baseline methodology for bus rapid transit projects"

Author:- Sunil Kumar Sharma

1) **Baseline:-** Since the additionality argument doesn't identify the baseline hence the alternative should be fixed to pre-project scenario only or continuation of current public transport. The emission reduction compared to current transport system would be real than any other hypothetical baseline scenario.
2) **Additionality flow chart (Common practice):-**The limitation shouldn't be based on number of cities with BRT rather it should be based on access to the BRT in that country. It can be done based on following approach:-
    a. Define the number of buses required for transportation of host country population. Let us say that one bus is required for every 3000 citizen
    b. Find out the population of the host country based on latest data, P
    c. Find out the number of BRT buses in the host country, B
    d. If B > 0.2 * P/3000, then the proposed project activity is common practice.
3) **Project emission:-** Project emission due to transportation of feeder buses should be removed as there must be one or another mode of transportation till the junction point even in the absence of BRT. Further feeder buses (mass transportation) would be always efficient, in terms of per passenger emission compared other mode of transportation (C, M, Z) hence the omission would be conservative also.
4) **Leakage:-** Rebound effect should be removed from the leakage as this is a result of sustainable development promoted by the project activity. Apart from project activities, there could be various other factors which could lead to the rebound effect like creation of job opportunity at SEZ etc.
5) **Additionality flow chart, step 3:-** The reason behind comparison of CDM revenue with 30% of O&M is not clear. There is no importance to this point. Any revenue from CDM would help to alleviate the barrier. In the opinion of author, the previous logic for demonstration of additionality through barriers only, in case the project finance is not repaid on commercial terms, should be retained.
6) **Changes of baseline parameters during the project crediting period:-** There are chances that some parameters used for calculating the baseline emission factors could change over time period. However this could be fixed for the crediting period. This is also appropriate because the baseline largely covers public mode of transportation system and the load factor of public mode of transport won't vary significantly over a period of time.

Minor points:-

1) The definition of Pi,y provided for equation 5 is not consistent with the definition provided for equation 7.
2) Some description is required before equation 3 to clarify that the equation is applicable for buses only.
3) Figure 2:- The titles provided in the flow chart should be in line with the titles provided in the explanation in the document.
4) Equation 12 seems to be wrong.
5) Equation 14 should be multiplied with 10^-6