Dear CDM SSC Team,

Following your email dated 31 May, Climate Focus is pleased to address the questions raised in paragraph 6 of the Information note: "Top-down development of standardized approaches for rural energy supply (biogas)" of the 36th meeting of SSC WG Annex 10, as follows:

Answer to question 6.a: According to the elaboration given in the technical report in Appendix I, we conclude that the suggested default value of 0.13 m^3/m^3, is too conservative due to the following reasons.

- The value is based on the most conservative average biogas production as reported in table 6 of cattle;
- The value is adjusted to a 50% discount factor to adjust to the misalignment to the standard which cannot be the case in all the covered countries;
- The digester technology used for the calculations is actually one of the least efficient designs;

As a result, the proposed standardized baseline is applicable in many different situations resulting in the most conservative outcome. We however suggest for some adjustments to make the standardized value more accurately applicable per region/country as the following:

- Incorporating the exact combination of animal types in a sampling group within the country/region;
- Applying further temperature range based on average temperature data per country;
- Applying the most common digester design within the host country;

Answer to question 6.b: The default value used as the standardized baseline presented in table 13 is very conservative, the reason why the monitoring parameters are limited to those mentioned under paragraph 40. With the current value we do not see any necessity for any additional monitoring data while with a less conservative value, sampling of the biogas consumption among households/farms could have been added to the monitoring data in order to avoid overestimation of the emission reductions.

Answer to question 6.c: Yes, instead of introducing several monitoring parameters, another solution would be to introduce another standardized baseline value based on the amount of biogas consumption per household per different regions/countries. There are some advantageous with this approach:

- It is the most secure way to ensure the destruction of the generated biogas (as long as the baseline manure waste management has been identified appropriately and as long as the operation of the bio-digesters are monitored);
- It is conservative enough as it does not take into account the amount of biogas that is not used through the stoves;
- It is the best solution to avoid false emission reductions as the amount of biogas that has been flared will be considered in the emission reductions only;

By introducing this approach it will be possible to have an standardized value for emission reductions per cubic meter of the bio-digester capacity.

Kind regards,
Climate Focus
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