

 CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)	
<p>This form should be used only by project participants and other stakeholders for submitting a “Letter to the Board” in accordance with the latest version of the <i>Modalities and procedures for direct communication with stakeholders</i></p>	
Name of the stakeholder ¹ submitting this form (individual/organization):	Gestora de Programa Marco Palma, S.L.
Address and contact details of the individual submitting this form:	Address: Costanilla de los Angeles, 13 28013 Madrid SPAIN Telephone number: +34 607 97 38 67 E-mail address: lphilp@cmepalma.com
Title/Subject (give a short title or specify the subject of your submission)	Post-Registration Boundary Changes for PoAs
Please mention whether the submitter of the form is:	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
Specify whether you want the letter to be treated as confidential ² :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
Please choose any of the type(s) below ³ to describe the purpose of this submission.	
<input checked="" type="checkbox"/> Type I: <input checked="" type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules <input type="checkbox"/> Standards. Please specify reference <input checked="" type="checkbox"/> Procedures. Please specify reference PCP v02.0 (EB66 An64) <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference <input type="checkbox"/> Type II: Request for Introduction of new rules <input type="checkbox"/> Type III: Provision of information and suggestions on policy issues	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

¹ DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

² As per the applicable modalities and procedures, the Board may make its response publicly available.

³ Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html> .

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To: cdm-info@unfccc.int
From: Larry Philp (Managing Director) lphilp@cmepalma.com
Date: 2 July 2012
Re: Post-Registration Boundary Changes for a PoA

Honourable Members of the CDM Executive Board

Dear Mr. Duan,

Paragraph 131 of the Project Cycle Procedure (v02.0, EB66 An64, hereinafter PCP) limits post registration changes in the design of a PoA to expanding its geographical boundary, disallowing other PoA design changes. A new PoA-DD and CPA-DD must be validated and submitted to reflect this change. Clarification is requested on the design changes that are allowed or disallowed, as detailed in the five following points:

1. **Essential Design Changes.** Since only changes to the geographical boundary are allowed, it is understood that other essential design elements cannot be modified (i.e. eligibility criteria, technologies / measures, size / scale, selection of approved baseline and monitoring methodologies, generic CPA project boundary, GHGs and their sources, means of determining the baseline scenario, methods for assessing additionality, levels at which environmental analysis and LSC are carried out, etc.). For planning and validation of such a post-registration change, it would be helpful if CMEs and DOEs had a list of PoA design elements that should not be modified.
2. **New Eligibility Criteria.** New eligibility criteria might need to be introduced as a result of other CDM requirements (for example, to take into account observations from local stakeholder consultations in the new region, or as a result of the DNA approval process for a new host country). By definition, the introduction of new criteria would add restrictiveness. Are new eligibility criteria allowed?
3. **Sectoral and Regional / Country Descriptions and Statistics.** Many sections of the PoA-DD and CPA-DD would require additional descriptive text and data to reflect the expanded geographical boundary. These changes could affect specific features of a PoA (for example, upon adding a new host country, an investment analysis to assess additionality would require new country-specific equity discount rates, interest rates, corporate tax rates, depreciation periods, etc.). Does paragraph 131 of the PCP limit in any way the introduction of new descriptive text and data regarding the expanded geographical boundary?
4. **Methodological Choices.** A PoA-DD must clearly specify the methodological choices. Such choices might not be applicable in a new region. For example, using the EF Grid tool, a PoA could select the off-grid option based on the original geographic boundary of the PoA, but if off-grid generation is less than 10% of total generation in the new region, such a selection would not be valid within the expanded geographical boundary. Under this example, the only means of achieving validation of the new PoA-DD would be modifying the methodological choices for the new region. Based on the definition of monitoring plan and monitoring methodology in the Glossary of CDM Terms, one could understand that the methodological choices are considered part of the monitoring plan and methodology (PCP paragraph 130 (b) (iii)), not being part of the design, and hence not subject to the restriction on design changes in paragraph 131. Clarification is requested if changes to methodological choices are subject to the design modification restrictions of paragraph 131.

5. Standards, Procedures and Forms. Apologizing in advance for our own confusion regarding the new standards, but we would understand that the request for post-registration change and its validation should be carried out under the standards and procedures in force at that future time, although the modified PoA-DD and CPA-DD should remain under the standards (including methodologies), procedures and forms that were used at registration. Confirmation or clarification is requested.

We are grateful for your attention to the request for clarification in this letter and would be pleased to discuss any of the issues raised at your convenience.

Respectfully yours,

Laurence W. (Larry) Philp
Managing Director

Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).

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If necessary, list attached files containing relevant information (if any)

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Section below to be filled in by UNFCCC secretariat

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History of document

Version	Date	Nature of revision
01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
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