



F-CDM-RtB

 <b>CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD”</b> <b>(Version 01.1)</b> <i>(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)</i>	
Name of the stakeholder <sup>1</sup> submitting this form (individual/organisation):	Project Developer Forum [Redacted]
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +65 6578 9286 E-mail Address: office@pd-forum.net
Title/Subject (give a short title or specify the subject of your submission)	Unsolicited letter regarding the expansion of positive lists of additional technologies.
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 <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<b>Purpose of the Letter to the Board:</b> Please use the space below to describe the purpose for submitting Letter to the Board. (Please tick only one of the four types in each submission )	
<input type="checkbox"/> <b>Type I:</b> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> <b>Request Clarification</b>  <input type="checkbox"/> Standards. Please specify reference  <input type="checkbox"/> Procedures. Please specify reference  <input type="checkbox"/> Guidance. Please specify reference  <input type="checkbox"/> Forms. Please specify reference  <input type="checkbox"/> Others. Please specify reference    Additivity tool 6.0.0           </div> <div style="text-align: center;"> <input type="checkbox"/> <b>Revision of Existing Rules</b> </div> </div>	
<input type="checkbox"/> <b>Type II: Request for Introduction of New Rules</b>	
<input checked="" type="checkbox"/> <b>Type III: Provision of Information and Suggestions on Policy Issues</b>	
Please use the space below to describe in detail the issue that needs to be clarified/revise or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any).	
<b>PROJECT DEVELOPER FORUM</b>	

<sup>1</sup> Note that DNAs and DOEs shall not use this form to submit letter to the Board.

<sup>2</sup> Note that the Board may decide to make this Letter and the Response publicly available



<p>To cdm-info@unfccc.int</p> <p>From office@pd-forum.net</p> <p>Date 22/4/2012</p> <p>Subject Additionality – expansion of positive lists</p>	<p><b>Project Developer Forum Ltd.</b> 100 New Bridge Street UK London EC4V 6JA</p> <p>Europe: +44 1225 816877 Asia: +65 6578 9286 Americas: +1 321 775 4870 <a href="mailto:office@pd-forum.net">office@pd-forum.net</a> <a href="http://www.pd-forum.net">www.pd-forum.net</a></p> <p>CHAIRMAN: Gareth Phillips t: +65 65789286 e: <a href="mailto:office@pd-forum.net">office@pd-forum.net</a></p>
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Honourable Members of the CDM Executive Board,  
Dear Mr. Duan,

The PD Forum would like to propose the expansion of the positive list of automatically additional projects. A positive list is an excellent tool to support projects that need additional finance in sectors where such projects co-exist with many carbon intensive technologies and practices that are economically more attractive. There are many technologies and sectors that are clearly additional and we would therefore like to kindly ask you to expand the positive list as soon as possible. Our suggestions for the expansion of the list are as follows:

Solar: In accordance with EB63 Annex 24, solar PV and solar thermal electricity up to 15MW are additional. We suggest that the cap in capacity of 15MW is not necessary and suggest that the all solar PV and solar thermal electricity projects can be deemed additional, regardless of installed capacity.

Wind: In accordance with EB63 Annex 24, off-shore wind up to 15MW is additional. Please expand automatic additionality regardless of installed capacity. Also, please expand to all wind regardless of installed capacity. While on-shore wind may become competitive in the next five years or so, it is not competitive, even in the best locations, at the moment. The inclusion can be reviewed every 3 years, as is decided for the automatic micro-scale technologies proposed by DNAs.

Geothermal Geothermal is to date not competitive, nowhere in the world. As for wind, the inclusion can be reviewed every 3 years.

Marine: In accordance with EB63 Annex 24, wave and tidal up to 15MW are additional. Also, there are many other marine technologies upcoming including those using the temperature difference between top and bottom of the ocean and the difference in salt content between sea and river water flowing into the sea. Thus, please expand automatic additionality regardless of installed capacity and sub-technology.

Household-level projects: Such projects (including cookstove and water purification, efficient light-bulbs etc.) should be automatically additional regardless of the size of the project. As each individual household or business unit is very small, the limit on the size of the project, including the small scale limit for small scale methodologies, should be waived.

May we suggest submitting this list to the 4<sup>th</sup> CDM Roundtable with the aim to have it expanded even further? Please do not hesitate to contact us in case you wish for further information.



Kind regards,

Gareth Phillips  
Chair, Project Developer Forum

Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).

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

- [replace this bracket with text, the field will expand automatically with size of text]

**Section below to be filled in by UNFCCC secretariat**

Date when the form was received at UNFCCC secretariat	23 April 2012
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**History of document**

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		