

 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>	
<i>Name of the stakeholder¹ submitting this form (individual/organization):</i>	Eco-Ideal Consulting Sdn Bhd
<i>Address and contact details of the individual submitting this form:</i>	Address: Suite C-7-2, Wisma Goshen, Plaza Pantai, Jalan 4/83A, Off Jalan Pantai Baharu, 59200 Kuala Lumpur, Malaysia Telephone number: +603-22848102 E-mail address: soonhy@ecoideal.com.my
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Grid emission factor
<i>Please mention whether the submitter of the form is:</i>	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify CDM Consultant
<i>Specify whether you want the letter to be treated as confidential²:</i>	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<i>Please choose any of the type(s) below³ to describe the purpose of this submission.</i>	
<input type="checkbox"/> Type I: <input checked="" type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules <input checked="" type="checkbox"/> Standards. Please specify reference Tool to calculate the emission factor for an electricity system, version 02.2.1 <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 <input type="checkbox"/> Type II: Request for Introduction of new rules <input type="checkbox"/> Type III: Provision of information and suggestions on policy issues	
<i>Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).</i>	

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> .

With reference to the *Tool to calculate the emission factor for an electricity system*, version 02.2.1 (EB 63, Annex 19), I would like to seek clarification on the *ex-post* option for the calculation of grid emission factor.

According to pages 5 and 6 of the abovementioned tool, for the simple OM, the simple adjusted OM and the average OM, there are 2 data vintages available for the calculation of the emission factor. For the *ex-post* option:

If the ex-post option is chosen, the emission factor is determined for the year in which the project activity displaces grid electricity, requiring the emissions factor to be updated annually during monitoring. If the data required to calculate the emission factor for year y is usually only available later than six months after the end of year y, alternatively the emission factor of the previous year y-1 may be used. If the data is usually only available 18 months after the end of year y, the emission factor of the year proceeding the previous year y-2 may be used. The same data vintage (y, y-1 or y-2) should be used throughout all crediting periods.

However, it was not clear should the data from previous year y-2 not be available, whether the latest available emission factor e.g. y-3 can be applied? If this is not acceptable, what could be the alternative as the release of official data is not within the project's control.

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).

We would like to suggest that the latest emission factor available and released can be used, even if it is older than year y-2.

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

Not applicable

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat 13 August 2012

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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.
Decision Class: Regulatory Document Type: Form Business Function: Governance		