

 <p>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</p> <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):	Jiwan Acharya Asian Development Bank
Address and contact details of the individual submitting this form:	Address: 6 ADB Avenue Mandaluyong City 1550 Telephone number: +632 632-6207 E-mail address: jacharya@adb.org
Title/Subject (give a short title or specify the subject of your submission)	Request for reconsideration of guidance proposed in EB 69 paragraph 93 (b)
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify Multilateral development Financial Institute
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 type="checkbox"/> Type I: <input type="checkbox"/> Request for clarification <input checked="" type="checkbox"/> Revision of existing rules <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference EB 69 Para 93 (b) <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).	
<p>>></p> <p>The Asian Development Bank (ADB) is assisting a number of developing member countries (DMCs) in Asia and the Pacific in the implementation of GHG emission reduction projects, and follows closely the regulation and methodology development by CDM EB.</p> <p>We note that CDM EB is considering to issue guidelines in validation of PoAs involving multiple methodologies and technologies in EB 69 report (http://cdm.unfccc.int/filestorage/r/8/K3OB5VGAQ1J4RU0PMTc8WISNL2XYFE.pdf/eb69_report.pdf?t=eTh8bWFnc2FufD_BhxahdpmH1ZLCdhcK5DtIQ_) paragraph 93 (b). This guideline requires development of one actual case</p>	

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> .

CPA DD for each technology/measure or when combination of methodologies is applied in the component CPAs of the PoA at the time of request for registration. From our assessment, this new guidance would significantly limit the POA functions, and would have significant negative impact on POA development, in particular in least developed countries (LDCs) and small island developing states (SIDS). In this regard ADB had consultation with few DNAs in the Pacific Island countries and they expressed concern regarding this. Therefore, we have serious concerns on this issue and would like to draw the great attention by the EB to reconsider this decision.

This provision defeats the basic concept of PoA including all the intentions of reduction in transaction costs and ease of administration. For all practical reasons, it would not be possible to find real cases for all the technologies/measures and methodologies included in the PoA at the time of requesting registration. We recommend instead that a framework of various scenarios can be made and presented to the DOE for validation at the time of PoA registration. The framework can also cover the criteria for inclusion of the CPA.

We also like to bring to your kind notice that to the best of our understanding, there are more than 15 PoA's around the world that are currently being developed using multiple technologies and methodologies under various stages of the CDM project cycle. Many of these PoA's also fall within the purview of ADB DMCs. Some of the countries have less than 50% electrification (10% in some cases). It will not be possible to develop a real case CPA for each methodology and technology in the PoA at the time of request for registration. The above decision would certainly have a detrimental effect on the future of these PoA's under development. In this light, may we request EB to reconsider the above decisions and allow request for registration for the PoAs having multiple methodologies and technologies by submitting of one real case CPA.

ADB has been collaborating with UNFCCC to promote CDM in LDCs, SIDS as well as countries with less than 10 registered CDM projects, and has organized three well attended workshops during the last three years. ADB also contributed to the CDM policy and methodology development process. Some of the major contributions relating to the application of multiple technology/measures and methodologies in PoA made by ADB and accepted by CDM EB are listed below:

- a) SSC_537 (<http://cdm.unfccc.int/methodologies/SSCmethodologies/clarifications/41087>) : A request was made to allow use of multiple methodologies (AMS I D and AMS I F) in single PoA. It also referred to AMS III H and AMS III G which deal with waste management. The idea was to allow for a larger concept of energy access or sanitation projects to be covered under the same umbrella of PoA. It allows enhancing the primary objective of PoA through reduction in cost and ease of implementation.
- b) SSC_547 (<http://cdm.unfccc.int/methodologies/SSCmethodologies/clarifications/63945>) : The concept of SSC_537 was further developed and additional permission was sought to include methodology AMS I A along with AMS I D and AMS I F. This was done mainly to cover many small renewable energy generation projects contributing towards access to energy in sustainable way. Further, an additional waiver was also sought to allow use of replaced fossil fuel energy sources.
- c) SSC_621 (<http://cdm.unfccc.int/methodologies/SSCmethodologies/clarifications/59531>) : This was additional clarification on use of multiple methodologies in a PoA. It made clear how various permutations and combination of methodologies could be used to cover all the project categories.

We hope that our inputs and suggestions on this issue will be favourably considered towards improving the CDM operation process.

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 request EB to reconsider proposed guidance with respect to EB 69 paragraph 93 (b). A PoA employing multiple technology and methodology should be allowed to apply request for registration with just one CPA of one methodology and one technology. The requirement

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	26 September 2012
Reference number	2012-166-S

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		