

 <p><b>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</b></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>	
<i>Name of the stakeholder<sup>1</sup> submitting this form (individual/organization):</i>	Sujatha Ramasamy Emergent Ventures India Private Limited
<i>Address and contact details of the individual submitting this form:</i>	5 <sup>th</sup> floor, Universal Trade Tower, Gurgaon –Sohna Road, Gurgaon, Haryana, India Telephone number: +91-9600180708 E-mail address: <a href="mailto:sujatha@emergent-ventures.com">sujatha@emergent-ventures.com</a>
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Query on Applicable Geographical Area in Common Practice Analysis
<i>Please mention whether the submitter of the form is:</i>	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify <b>Consultant</b>
<i>Specify whether you want the letter to be treated as confidential<sup>2</sup>:</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) below<sup>3</sup> to describe the purpose of this submission.</i>	
<input type="checkbox"/> <b>Type I:</b> <input checked="" type="checkbox"/> <b>Request for clarification</b> <input type="checkbox"/> <b>Revision of existing rules</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 checked="" type="checkbox"/> Others. Please specify reference Tool for the demonstration and assessment of additionality . Version 06.1.0, EB 69, Annex 20  <input type="checkbox"/> <b>Type II: Request for Introduction of new rules</b> <input type="checkbox"/> <b>Type III: Provision of information and suggestions on policy issues</b>	
<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>	

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

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

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

&gt;&gt;

We would like to draw attention of the CDM Executive Board to an issue related to considering “Applicable Geographical Area” to conduct common practice analysis in establishing additionality for large scale projects in accordance with the Methodological tool “Tool for demonstration and assessment of additionality”, Version 06.1.0, EB 69, Annex 20.

**Applicable geographical area** covers the entire host country as a default; if the technology applied in the project is not country specific, then the applicable geographical area should be extended to other countries. Project participants may provide justification that the applicable geographical area is smaller than the host country for technologies that vary considerably from location to location depending on local conditions.

**Project case:** Project under consideration is hydro power project under implementation in the country of Nepal and electricity will be transmitted to **Northern Eastern Western and North Eastern (NEWNE)** grid of India. Technology is not country specific. Hence project boundary include physical boundary of project site in Nepal, Electricity grid system of Nepal and NEWNE grid of India. It is also worthwhile to mention that India and Nepal has delineation of electricity grid transfer.

Considering the above project case, we would like to understand from the Chair, which of the below mentioned options shall be considered for choosing “Applicable Geographical Area” while carrying out the common practice analysis for establishing additionality.

**Option 1:** As mentioned in the methodological tool, “applicable geographical area covers the entire host country as a default”, taking the direct observation of the above statement in the methodological tool, one can opt Nepal as a default geographical area for the above mentioned project case.

**Option 2:** Since electricity generated from Nepal will be transmitted to India, and in project boundary both grid systems are included, one can also opt two countries i.e. both India and Nepal as applicable geographical area to conduct common practice analysis.

Clarification is being sought on the expressed issue. Executive Board is requested to take the matter for its kind consideration and action.

*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).*

&gt;&gt;

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

*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	18 October 2012
Reference number	2012-176-S

-----

#### **History of document**

<b>Version</b>	<b>Date</b>	<b>Nature of revision</b>
01.2	08 February 2012	Editorial 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		