 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):	Project Developer Forum
Address and contact details of the individual submitting this form:	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)	Proposal to require actual case CPA-DD for every technology/measure included in the PoA DD
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify NGO
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 checked="" type="checkbox"/> Request for clarification <input 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 <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 checked="" 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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From Gareth.Phillips@pd-forum.net
Date 16th Janaruy 2013
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Subject **Proposal to require actual case CPA-DD for every technology/measure included in the PoA DD**

Honourable Members of the CDM Executive Board,
Dear Chair,

The Project Developer Forum (PD Forum) welcomes the efforts of the EB and the secretariat in developing the recent guidelines and the 'Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities' which has immensely facilitated the project developer's (and DOEs) in development of multiple methodologies/multiple technologies PoAs.

The PD Forum would like to express their concerns on the further guidelines provided by the CDM EB during EB 69 with regards to validation of PoAs involving multiple methodologies and technologies. We understand this will be further discussed in EB 70 and we are also submitted these comments via the call for input on the annotated agenda to EB 70.

As per paragraph 93 b of EB 69 report,

(b) Component project activity design documents (CPA-DDs): The Board agreed that one actual case CPA-DD for every technology/measure included in the PoA design document (PoA-DD) is required at the time of registration of the PoA-DD; similar requirements would apply when combinations of methodologies are applied in component project activities (CPAs);

In practice it is very difficult to have a real case for each technology/measure at the time of PoA registration because developing each real case requires significant resources. On the other hand, listing them in a registered the PoA DD provides PPs with greater certainty that a number of activities can be developed and will be eligible for CERs, giving them time to raise finances for further development work. As per our assessment the above guideline would have negative impact on multiple technologies/measures PoA development, especially in countries where the transaction cost is very high (Please refer table below for list of some of the PoA that may be impacted by such a decision). Also considering that the current PoA procedures/guidelines/standards⁴ deal with various issues associated with multiple technologies/measures /methodology in great detail at the time of validation, the above requirement may be unwanted.

From EB 69 – Proposed agenda annotations, Annex 17, it is understood that one of the reasons for suggesting the above requirement is to 'ensure consistency with the requirements specified in revised methodologies'. While not denying the fact that consistency of the requirements as specified in revised methodology is very important and has been dealt with to an extent in the 'Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities', the PD Forum feels

⁴ Guidelines for the consideration of interactive effects for the application of multiple CDM methodologies for a programme of activities / Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities / Approval of the application of multiple methodologies to a programme of activities

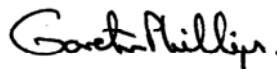
there can be other alternative approaches by which this problem can be dealt with.

We note that Annex 10 the annotated agenda for EB70 it is proposed that a grace period is allowed for the submission of specific CPA-DDs for other technology/measures or methodologies or combinations thereof planned under the PoA at a later stage. Clearly we would favour a grace period of two years or longer, to give PPs time to develop these activities. The current depressed market conditions mean that PPs are unlikely to be able to complete the development CPA-DDs in good time and a shorter grace period could curtail the potential of PoA activities.

The proposed guidance does not cover the steps to be taken in the event that a CPA-DD for a particular technology/measure or methodology is not submitted within the required grace period and we would propose that in this event, the technology/measure or methodology is subsequently excluded from the PoA-DD.

We hope that the EB will consider the potential negative impacts the above recommendation may have on PoA development, especially in LDC/SIDS. Should there be any questions regarding our comments, please do not hesitate to contact me through the contact details provided above.

Kind regards,



Gareth Phillips
Chairman, Project Developer Forum

List of some of the multiple technology/measure PoA's currently under validation that may be impacted with the new guidelines

<u>Project Title</u>	<u>Host Country</u>	<u>Methodology</u>
<u>Standard Bank Renewable Energy Programme</u>	<u>Ghana</u>	<u>ACM0002 ver. 12</u>
<u>Tanzania Renewable Energy Programme</u>	<u>United Republic of Tanzania</u>	<u>AMS-I.F. ver. 2</u> <u>AMS-I.D. ver. 17</u>
<u>East Africa Renewable Energy Programme (EA-REP)</u>	<u>Kenya</u> <u>Rwanda</u> <u>Uganda</u>	<u>AMS-I.D. ver. 17</u>
<u>Sustainable Promotion of East African Renewables (SPEAR)</u>	<u>Burundi</u> <u>Kenya</u> <u>Sudan</u> <u>Uganda</u>	<u>ACM0002 ver. 13</u> <u>AMS-I.D. ver. 17</u>
<u>Small-Scale Renewable Electricity Advancement Programme</u>	<u>United Arab Emirates</u> <u>Albania</u> <u>Bahrain</u> <u>Egypt</u> <u>Jordan</u> <u>Kuwait</u> <u>Lebanon</u> <u>Libya</u> <u>Morocco</u>	<u>AMS-I.F. ver. 2</u> <u>AMS-I.D. ver. 17</u>

	<u>Mauritius</u> <u>Oman</u> <u>Pakistan</u> <u>Qatar</u> <u>Saudi Arabia</u> <u>Tunisia</u>	
<u>Programme of Activities (PoA) for Sustainable Renewable Energy Power Generation in Papua New Guinea (PNG)</u>	<u>Papua New Guinea</u>	<u>AMS-I.F. ver. 2</u> <u>AMS-I.D. ver. 17</u> <u>AMS-I.A. ver. 14</u>
<u>Regional Biogas PoA</u>	<u>Malaysia</u> <u>Papua New Guinea</u> <u>Solomon Islands</u>	<u>AMS-III.H. ver. 16</u> <u>AMS-I.C. ver. 19</u> <u>AMS-I.F. ver. 2</u> <u>AMS-I.D. ver. 17</u> <u>AMS-I.A. ver. 14</u>
<u>PoA for small scale renewable energy development in Egypt</u>	<u>Egypt</u>	<u>AMS-I.F. ver. 2</u> <u>AMS-I.D. ver. 17</u> <u>AMS-I.A. ver. 15</u>
<i>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).</i>		
<i>If necessary, list attached files containing relevant information (if any)</i>	• [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 January 2013	
Reference number	2013-219-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		