

	CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2) 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 Modalities and procedures for direct communication with stakeholders
Name of the stakeholder ¹ submitting this form (individual/organization):	Mr. M.S.K.V.N.Rao Individual
Address and contact details of the individual submitting this form:	Address: G-807, Purva Panorama, BG Road, Bangalore Telephone number: 08040432421 E-mail address: msknag@gmail.com
Title/Subject (give a short title or specify the subject of your submission)	Need for review and change of procedures and timelines for CER issuance
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify Individual
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.	
<p><input checked="" type="checkbox"/> Type I:</p> <p style="margin-left: 40px;"> <input type="checkbox"/> Request for clarification <input checked="" type="checkbox"/> Revision of existing rules </p> <p style="margin-left: 80px;"> <input type="checkbox"/> Standards. Please specify reference <input checked="" type="checkbox"/> Procedures. Please specify reference EB54, Annex 35, Version 01.2 <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference </p> <p><input type="checkbox"/> Type II: Request for Introduction of new rules</p> <p><input type="checkbox"/> Type III: Provision of information and suggestions on policy issues</p>	
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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The timelines and the procedural steps for the CER issuance are the major concern to Project Proponents, especially for those PPs who already entered into an ERPA with a buyer.

The UNFCCC has set guidelines for the compliance buyers and the Buyers in turn setting deadlines in ERPA, for actual CER transfer to their CER Registry account, in accordance with the UNFCCC guidelines.

To meet the ERPA timelines of CER transfer, PPs must get their CERs issued in time. In spite of thorough scrutiny from DOEs during verification process, PPs are not sure whether the Verification report would pass through Completeness check (CC), information and reporting check (IRC) and the EB's clearance for issuance.

At times for very simple reasons, the "issuance request" may come out of the queue. For example in a power project's CER issuance request, 1st verification monitoring period "ending date" is matching with the "starting date" of 2nd verification report. This is for the reason that Joint Meter Reading (JMR) date. The reading will be taken at one particular time on this JMR Date. That means, the next meter reading count starts from the same JMR date and time. This is practically correct and no overlapping of meter readings happened. This situation was clearly explained Verification Report. But its not accepted in "Completeness check" stage. The reason is 'same dates' for 'end-and-start of the monitoring periods of consecutive periods' cannot be accepted by the system at UNFCCC. While correcting this dates, PP has to lose some quantum of CERs and also many valuable days (as it has to be in the process queue again).

Another example of delay: Once the "issuance request" is submitted, the project is not being scheduled immediately and has to wait for many days just to get scheduled. And even after that, the project will be there in "awaiting commencement" stage for many days. Sometimes, though the scheduled date to start a process step (say awaiting commencement of completeness check) is declared and even the date is passed, the status would still show a past date. Sometimes, even when the scheduled completeness check dates are passed, the project still won't be released from that stage for 1 or 2 days. These are few examples of delays happening at issuance stage and thus PP may lose the ERPA deadlines and in turn lose the revenue and cannot fill the financial barrier which is corner bone for CDM success.

Based on the above explanation, clarification sought for;

Query1:

May please clarify why not there would be an overlap of dates, as long as there is **no** overlap and double count of electricity metering. This would allow mentioning of same date for "end of one monitoring period and "start" of next monitoring period, as long as the meter readings and thus net electricity is not double counted.

Suggestions are made in the next item box requesting to revise the procedure for issuance with reference to some clauses *from EB54, Annex 35, Version 01.2*

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).

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Reference clauses from EB54, Annex 35, Version 01.2 (Reference clauses and the corresponding suggestions to reduce process time are given)

8. The secretariat shall maintain a publicly available list of all submitted requests for issuance. The schedule of requests for issuance to be processed, including the expected date of commencement, shall be made publicly available. The commencement of the processing of these requests for issuance shall be scheduled in accordance with the secretariat's operational plans, i.e. monthly quotas. The secretariat's operational plans will also incorporate any relevant instructions from the Executive Board.

Suggestion 1: *Instead of monthly quotas, a fixed number of Projects shall be allowed for processing at any point of time. Once the issuance request is submitted the project shall be placed automatically and immediately by the system into relevant stage as long as there is a slot vacant in the quota.*

9. Upon commencement of the processing of the request for issuance the secretariat will conduct within 7 calendar days a completeness check to determine whether the request for issuance is complete in accordance with latest applicable version of the completeness checklist for requests for issuance.

Suggestion 2: *UNFCCC may increase the workforce and Completeness check step can be completely avoided and merged with Information and reporting check.*

10. Upon conclusion of the completeness check, the secretariat will notify the project participant(s), as identified in the Modalities of Communication form, and the DOE of the result of the completeness check, including an elaboration of the underlying reasons, and the secretariat shall make the result of the completeness check publicly available by publishing it on the UNFCCC website. If the request for issuance does not meet the requirements of the completeness check, then upon submission of the revised documentation the request for issuance shall be treated as a new submission of a request for issuance.

Suggestion 3: *Completeness check and IRC may be completed in 15 days' time. If it's not met the requirements of the check and come out of the queue, then, after resubmission, it shall be placed in a separate process queue and can start from where it has come out of the queue. This is possible when the resubmitted documents are made in clean and track change mode.*

11. Upon a determination by the secretariat that the request for issuance meets the requirements of the completeness checklist, the secretariat will conduct within 23 calendar days an information and reporting check in accordance with the latest applicable version of the information and reporting checklist for request for issuance, which secretariat shall make publicly available by publishing it on the UNFCCC website.

Suggestion 4: *Same as Suggestion 3 above. In addition, if the CC and IRC are completed by the reviewer before the scheduled time, it may please be released immediately without waiting for last day of the scheduled deadline, which is being happened currently.*

14. The secretariat will notify the project participant(s), as identified in the Modalities of Communication form, the designated national authority(ies) of the Party(ies) involved, and the DOE that: the request for issuance has been received by the Executive Board for consideration of issuance; the secretariat has published the request for issuance; and, the last date by which members of the Executive Board or a Party involved may request a review of request for issuance, which shall be 28 calendar days after the date of publication of the request for issuance.

15. The secretariat will prepare and send to the Executive Board a summary note on the request for issuance, within 14 days calendar days of date of publication of the request for issuance

Suggestion 5: *A "summary note" format of about 2 pages, for Executive Board, can be made a part of Monitoring Report itself at the beginning of the report. The same can be passed through "CC & IRC" and thus the time for review by the EB can be reduced to any day within 15 days. Similar to 3 or more Members who may request for review, if 3 members reviewed and found its OK, with them the CERs can be issued any day within these 15 days itself. This will help expediting the issuance.*

<i>If necessary, list attached files containing relevant information (if any)</i>	<ul style="list-style-type: none"> • Nil
Section below to be filled in by UNFCCC secretariat	
Date when the form was received at UNFCCC secretariat	19 February 2013
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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.
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