

 <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):	World Bank, Carbon Finance Unit Klaus Oppermann
Address and contact details of the individual submitting this form:	Address: 1818 H Street N.W. Washington, D.C. 20433, USA Telephone number: (202) 4 73-6363 E-mail address: koppermann@worldbank.org
Title/Subject (give a short title or specify the subject of your submission)	Clarification and rules for PoAs and CPAs
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify Multilateral Development Bank
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 checked="" type="checkbox"/> Type I: <input checked="" type="checkbox"/> Request for clarification <input checked="" type="checkbox"/> Revision of existing rules <input checked="" type="checkbox"/> Standards. Please specify reference Validation and Verification Standard, Project Standard, Project Cycle Procedure <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input checked="" type="checkbox"/> Forms. Please specify reference F-CDM-PoA-DD v0.3.0, and F-CDM-SSC-PoA-DD v02.0 <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).	

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> .

Dear Members of the CDM Executive Board,

We would like to seek clarification regarding the following requirements for PoAs under the Project Standard v02.1, the CDM Validation and Verification Standard v 03.0 and the CDM Project Cycle Procedure v03.1:

1- For inclusions of new CPA-DDs under PoA-DDs that were registered under the previous VVM track, it is unclear if new CPA-DDs need to follow the exact registered generic CPA-DD (along with the registered VVM form) or if it needs to follow the new CPA-DD VVS Form v0.2.0, even though there may be some inconsistencies due to changes in the most recent version of the Form. It is unclear if every time there is a change to the CPA-DD Form, there needs to be an update to the generic CPA-DD and if this would require EB approval, or not.

The only relevant text about inclusion found on the Project Standard says:

“186. The coordinating/managing entity shall then submit to a DOE a completed CPA-DD specific to the proposed CPA demonstrating compliance of the CPA with all applicable requirements.”

However it is unclear if using the exact registered generic CPA-DD with the old template format is part of the applicable requirements.

2- For registered PoAs under the VVM track, where sampling for monitoring was defined previous to the implementation of the Sampling Standard, which should prevail? Should the CME follow what was written on the PoA-DD and CPA-DDs having the benefit of being early movers, or do they need to follow the sampling standard, even though it came into force after the PoA's registration?

The only relevant text about sampling on the project standard states:

156. If the coordinating/managing entity utilizes sampling for the determination of parameter values for calculating GHG emission reductions, the coordinating/managing entity shall develop and describe the sampling plan in accordance with the “Standard for sampling and surveys for CDM project activities and programme of activities”.

However it is not clear for already registered PoAs, if they can follow what is written in them, or if they need to change their monitoring plan, and thus practices, so as to be able to follow the Sampling Standard.

3- If a registered PoA-DD under the VVM track needs to be revised for a post registration change, it is unclear if the Form itself should also be revised to follow the VVS version. As this was not required when revisions were done to regular PDDs, we would like to seek clarification on this requirement for PoA-DDs.

We would also like to seek the revision of existing rules (Project Standard v02.1, the CDM Validation and Verification Standard v 03.0 and the CDM Project Cycle Procedure v03.1) as follows:

1- Under the current rules, if a single CPA requires a request for deviation or a post registration change, the whole PoA needs to delay verification given that all CPAs are to be reported in a single Monitoring Report for the PoA with one issuance period. We would like to suggest to change the rules for monitoring of a PoA such that if a CPA requires a post registration change, the whole PoA is not delayed for one single CPA, making it more cost efficient for the CME.

2- We would also like to suggest to expand the current rules on inclusion of an additional measure/technology to an already included CPA (CPA specific), as is the case for PoAs.

3- On the Standard for Sampling and Surveys for CDM project activities and Programme of Activities, paragraph 20 says “Parameter values shall be estimated by sampling in accordance with the requirements in the applied methodology separately and independently for each of the CPAs included in the PoA *except* when a single sampling plan covering a group of CPAs is undertaking applying 95/10 confidence/precision for the sample size calculation” (emphasis added); however this exemption is not made on the Project standard, paragraph 236 (b), where it is stated that a single monitoring report for a PoA is to be submitted “containing all monitoring results for all CPAs, included in the PoA, *clearly separating the monitoring results* of individual CPAs, as well as grouping the monitoring results by CPA type defined by the relevant generic CPA-DD”. (emphass added)

We therefore suggest adding the same exemption from the Sampling Standard to the Project Standard paragraph 236 (b), in order to make them consistent.

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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We suggest the following:

- 1- Allowing for registered PoA-DDs to include CPA-DDs with the registered generic CPA-DD templates, regardless of the development of new Forms/Templates. We suggest that like regular PDDs they be updated only at the renewal of the crediting period
- 2- To allow registered PoAs to be able to apply what was validated and accepted by the CDM EB on their Design Documents, and changes of rules/standards only to be applicable to new PoAs.
- 3- To be consistent with past revisions of PDDs, and not require the update of the PoA-DD Form if a post registration change is required.
- 4- Allow for CPAs that require post registration changes to be submitted in a different Monitoring Report of the PoA.
- 5- Allow the inclusion of an additional measure/technology to an already included CPA
- 6- Adding the same exemption from the Sampling Standard, paragraph 20, to the Project Standard paragraph 236 (b), in order to make them consistent.

We want to thank you for your consideration,

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

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History of document

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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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