



**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***

<i>Name of the stakeholder<sup>1</sup> submitting this form (individual/organization):</i>	Ken Newcombe C-Quest Capital Malaysia Limited
<i>Address and contact details of the individual submitting this form:</i>	Address: 1211 Connecticut Avenue, NW - Suite 800 Washington, DC 20036 - USA Telephone number: +1-202 416-2401 E-mail address: <a href="mailto:knewcombe@cquestcapital.com">knewcombe@cquestcapital.com</a>
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	CDM PoA Rule - Synchronized issuance request.
<i>Please mention whether the submitter of the form is:</i>	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
<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 checked="" type="checkbox"/> <b>Revision of existing rules</b> <input type="checkbox"/> Standards. Please specify reference - 12.10.1 (b) - CDM Project Standard - 10.2.2 - Paragraphs 292: (b) and (c); 294 and 295. <input type="checkbox"/> Procedures. Please specify reference - Paragraph 185 - CDM-EB70-A04 CDM Project Cycle Procedure <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference  <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>.



Malaysia Limited  
Reg No LLO7014

17 June 2013

Mr. Peer Stiansen, Chair of the CDM Executive Board  
UNFCCC Secretariat,  
Martin-Luther-King-Strasse 8,  
D 53153, Bonn  
Germany

Dear Mr. Stiansen,

We, C-Quest Capital, are writing to you in advance of the 8<sup>th</sup> CDM Roundtable, as a follow up of PoA issues addressed in the 7<sup>th</sup> CDM Roundtable, and subsequently at EB 73.

We noted with encouragement that participants at the 7<sup>th</sup> CDM Roundtable recognized a number of PoA related issues impeding the issuance of CERs from such Programmes and were eagerly waiting to see proposed guidance from the Secretariat. However, we note that the Secretariat has not developed such guidance, and we are extremely nervous that delay against this agenda item will affect our entire business.

These issues have been captured in *Annex 10 of EB 73 meeting agenda – “Concept Note – Revision of PoA related requirements in standards, guidelines and procedures”*. The CDM PoA rule that affects us most is the requirement that all CPAs in a PoA must be processed for Verification and Issuance simultaneously, in a synchronized issuance request. The current rules require all CPAs of a PoA “*to be included in the monitoring plan and in the request for issuance for a specific monitoring period*”.

PoAs whose verification are currently in process or ready to start verification are in most cases those PoAs whose CERs have been committed to buyers. CPAs in these PoAs are invested in by different entities and have naturally different paces of development. If these verifications cannot progress because of relatively different stages of CPA maturity, developers like us (and others in the same situation) are at risk of defaulting on commitments and having contracts terminated. This would be a serious blow to early PoA development, and a particularly bad blow to us handling ten PoAs across the world.

In light of these PoA rules, we would be extremely grateful if the CDM Roundtable discussed the following proposals for revision in PoA rules:

1. Allow three requests for issuance (and corresponding monitoring reports) for the same monitoring period.
2. For the first two requests for issuance/monitoring periods, cancel the requirement to not request issuance within 90 days of the previous request.
3. Suggest that the Secretariat develop an internal process, under the current manual system, to handle multiple issuance requests for the same monitoring period. As the Secretariat is anyway developing a web-based workflow for Registration and Issuance for PoAs this requirement can be taken into account easily.

We trust you will recognize the urgency as certain POAs are in Issuance stages, and remain grateful for your consideration at relevant fora such that the Secretariat may develop guidance for approval by the Executive Board at its seventy fourth meeting (EB 74).

Sincerely,



Ken Newcombe

*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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*If necessary, list attached files containing relevant information (if any)*

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**Section below to be filled in by UNFCCC secretariat**

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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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