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.

<table>
<thead>
<tr>
<th>Name of the stakeholder submitting this form (individual/organization):</th>
<th>Karen M. Nagai</th>
<th>Ecopart Assessoria em Negócios Empresariais Ltda. (EQAO)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address and contact details of the individual submitting this form:</td>
<td>Address: Padre João Manoel, 222 – 01411-000 – São Paulo, SP – Brazil</td>
<td>Telephone number: +55 (11) 3063-9068</td>
</tr>
<tr>
<td>Title/Subject (give a short title or specify the subject of your submission):</td>
<td>Inclusion of more than one large scale component/project using the same measure in to one CPA.</td>
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<td>Please mention whether the submitter of the form is:</td>
<td>☑ Project participant</td>
<td>☐ Other stakeholder, please specify</td>
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<tr>
<td>Specify whether you want the letter to be treated as confidential:</td>
<td>☐ To be treated as confidential</td>
<td>☑ To be publicly available (UNFCCC CDM web site)</td>
</tr>
<tr>
<td>Please choose any of the type(s) below to describe the purpose of this submission.</td>
<td></td>
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<tr>
<td>☐ Type I:</td>
<td>☑ Request for clarification</td>
<td>☐ Revision of existing rules</td>
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<td></td>
<td>☐ Standards. Please specify reference</td>
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<td></td>
<td>☑ Procedures. Please specify reference</td>
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<td></td>
<td>☐ Forms. Please specify reference</td>
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<tr>
<td>☐ Type II: Request for Introduction of new rules</td>
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<tr>
<td>☐ Type III: Provision of information and suggestions on policy issues</td>
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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.
According to §112 of the “CDM Project Cycle Procedure”:

“To include a CPA in a registered CDM PoA, the coordinating/managing entity shall forward the completed specific case CPA-DD to any DOE, after having ensured that the CPA and the specific case CPA-DD meet the eligibility criteria for inclusion in the PoA defined in the PoA-DD and its generic CPA-DD. The coordinating/managing entity may forward more than one specific case CPA-DD at one time. Only upon the approval of the first specific case CPA-DD corresponding to a generic CPA-DD by the Board, CPAs corresponding to that generic CPA-DD may be included in the registered CDM PoA”.

However, the statement above does not clarify about the inclusion of more projects/components in a single CPA. Also, in the “CDM Project Standard”, there is no information regarding the inclusion of more than one component/project in a CPA, but the inclusion of CPAs in a registered PoA.

According to the glossary of CDM terms (version 7.0), CPA is:

“a single measure, or a set of interrelated measures under a PoA, to reduce GHG emissions by sources or result in net anthropogenic GHG removals by sinks, applied within a designated area defined in the baseline methodology(ies)”.

To the best understanding of the Project Participants (PPs), there is no CDM rule that prohibit the inclusion of more than one component/project applying the same measure in a CPA.

Therefore, the PPs would like to request the following clarifications considering no limitations in the eligibility criteria of the registered PoA for the inclusion of more than one component in a CPA:

1. Is it possible to include more than one component (plant) applying the same measure in a CPA?
2. In the case of small scale PoA, it can be included CPAs considering the limitations of small scale projects. Thus, is there a limit in respect to installed capacity for large scale projects to be included in a CPA?

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).

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

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

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History of document

<table>
<thead>
<tr>
<th>Version</th>
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<th>Nature of revision</th>
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<tr>
<td>01.2</td>
<td>08 February 2012</td>
<td>Editorial revision.</td>
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<tr>
<td>01.1</td>
<td>09 August 2011</td>
<td>Editorial revision.</td>
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