

	<p align="center">CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</p> <p align="center">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>
<p>Name of the stakeholder¹ submitting this form (individual/organization):</p>	<p>Innovative Carbon Investment Co.,Ltd. Alice Yang</p>
<p>Address and contact details of the individual submitting this form:</p>	<p>Address: Room 2706, North building, Tianjiaofudi, Dujuan road No.99, Yuelu district, Changsha city, Hunan province, China Telephone number: +86 18900785159 E-mail address: alice.yang@mailici.com</p>
<p>Title/Subject (give a short title or specify the subject of your submission)</p>	<p>Clarification on the PoAs registered under VVM track and the paragraph 20 of AMS-III.D(ver.19.0)</p>
<p>Please mention whether the submitter of the form is:</p>	<p><input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify Private corporation</p>
<p>Specify whether you want the letter to be treated as confidential²:</p>	<p><input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)</p>
<p>Please choose any of the type(s) below³ to describe the purpose of this submission.</p>	
<p><input checked="" type="checkbox"/> Type I:</p> <p style="padding-left: 40px;"><input checked="" type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules</p> <p style="padding-left: 80px;"><input checked="" type="checkbox"/> Standards. Please specify reference Validation and Verification Standard, Project Standard, Project Cycle Procedure</p> <p style="padding-left: 80px;"><input type="checkbox"/> Procedures. Please specify reference</p> <p style="padding-left: 80px;"><input type="checkbox"/> Guidance. Please specify reference</p> <p style="padding-left: 80px;"><input type="checkbox"/> Forms. Please specify reference</p> <p style="padding-left: 80px;"><input checked="" type="checkbox"/> Others. Please specify reference AMS-III.D, reference 2013-247-S</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>	
<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).</p>	
<p>>></p> <p>Dear Members of the CDM Executive Board,</p> <p>We would like to seek clarifications regarding the following two sections:</p> <p>1. The way of the participants of the PoAs registered under the VVM track to continue their CDM</p>	

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> .

procedure under the new guidelines of the Project Standard (ver 04.0), the CDM Validation and Verification Standard (ver 04.0) and the CDM Project Cycle Procedure (ver 04.0).

1) According to the reference 2013-247-S which is the response for the “Clarification and rules for PoAs and CPAs” raised by the World Bank, the CPAs in PoAs that have been registered under the CDM VVM track, as of 31 January 2013, templates for the CDM VVS track must be used. It states that the generic CPA-DD must be converted into the template for the VVS track (Part II only of the PoA-DD form for the VVS track, leaving Part I blank) and be submitted for inclusion, to ensure consistency between the generic CPA-DD and specific CPA-DDs to be included in the future. And according to the “Guideline: Completing the programme design document form for CDM programmes of activities Version 04.0”, the Part II of this guideline should be repeated for each generic CPA-DD corresponding to each technology/measure, each methodology and each combination such that one completed Part II represents one generic CPA-DD.

Thus, there will be a problem that in case that there is the PoA registered under the VVM track which include two combinations of methodologies, combination I of AMS-III.D and AMS-I.C and combination II of AMS-III.D, AMS-I.C and AMS-I.F, and it was registered with one generic CPA-DD and one specific CPA-DD in which the special CPA adopted the combination II of AMS-III.D, AMS-I.C and AMS-I.F, thus, when the generic CPA-DD updated according to the above guidelines, there will be two part II in the PoA-DD in order to correspond to the two kinds of the generic CPA, thus there will be two generic CPA-DD, while there is only specific CPA-DD was registered, thus this will result a specific CPA-DD to be provided for the generic CPA-DD which adopts the combination I of AMS-III.D and AMS-I.C after the registration of the PoA. According to the PS(ver04.0), in this case, the specific-case CPA-DD shall be provided for approval by the Board in accordance with the post-registration change process as defined in section 6.2 of the Project cycle procedure. **However, it is unclear if the inclusion of the specific CPA-DD resulted from the above situation shall apply the post-registration change process as defined in the PCP(ver 04.0), i.e., if the inclusion of the specific CPA-DD corresponding the generic CPA-DD which adopts the combination I of AMS-III.D and AMS-I.C shall apply the the post-registration change process. Please clarify.**

The relevant text in PCP(ver 04.0) is as follows:

131. For CDM PoAs, with regard to the changes referred to in paragraph 130(b)(iv) above, only the following changes shall be allowed:

(c) If a PoA includes more than one generic CPA-DD, addition of specific case CPA-DDs corresponding to generic CPA-DDs for which a specific case CPA-DD has not been submitted at the time of request for registration of the PoA;

2) According to the PS(ver04.0), there shall be only one monitoring report for all the CPAs of the PoA, but according to the PCP(ver04.0), there might be more than one monitoring report for the CPAs of the PoA. **Therefore, please clarify if all the CPAs of the PoA must request issuance simultaneously, and if all the monitoring results of all the CPAs of the PoA must be included in a monitoring report.**

The relevant text in PS(ver 04.0) is as follows:

239. The coordinating/managing entity shall:

(b) Prepare a single monitoring report (i.e. one document) containing all monitoring results of 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;

The relevant text in PCP(ver 04.0) is as follows:

177. The project participants of a registered CDM project activity or the coordinating/managing entity of a registered CDM PoA shall prepare (a) monitoring report(s) in accordance with the “Clean development mechanism project standard”, and submit it/them together with supporting documentation to the DOE contracted by the project participants or the coordinating/managing entity to perform verification of the monitored GHG emission reductions or removal enhancements.

2. In the latest version of of the AMS-III.D(ver.19.0), the sentence was added in the paragraph 20, which states that "If the recovered biogas is combusted for electrical/thermal energy production or for other gainful use, the methane destruction efficiency can be considered as 100%. However, this use of the recovered biogas shall be included in the project boundary and its output shall be monitored in order to ensure that the recovered biogas is actually destroyed, even if the emission reductions from this component are not claimed. ". According to the sentence, the output, whether it is thermal energy or electricity, generated from the recovered biogas should be monitored, however, as the AMS-I.C states that"For household or commercial applications/systems, whose maximum output capacity is less than 45 kW thermal and where it can be demonstrated that the metering of thermal energy output is not plausible, as in the case of biomass stoves, gasifiers, driers, water heaters etc., the project output energy shall be estimated based on consumption of the biomass (in terms of energy quantity) times the efficiency of the project equipment.", the AMS-I.C consider the impossibility of direct metering some kind of thermal output, while in the AMS-III.D, there are no such consideration,but there are indeed such situations that the output from equipments like biogas stoves and so on can not be monitored, **so please clarify that in such case, whether the thermal output can also be calculated using the function 9 in the AMS-I.C other than monitoring the output directly.**

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

Date when the form was received at UNFCCC secretariat 13 August 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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