

 <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):	Kyle Silon DelAgua
Address and contact details of the individual submitting this form:	Address: PO Box 1594, Utexrwa Compound, Kinamba-Gacuriro Rd., Kigali, RWANDA Telephone number: +250 788 385 233 E-mail address: kyle.silon@delagua.org
Title/Subject (give a short title or specify the subject of your submission)	Request for revision to guidelines for post-registration design changes for a SSC PoAg
Please mention whether the submitter of the form is:	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
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 type="checkbox"/> Request for clarification <input checked="" type="checkbox"/> Revision of existing rules <input type="checkbox"/> Standards. Please specify reference <input checked="" type="checkbox"/> Procedures. Please specify reference - Project Cycle Procedures, v 8 para 150 <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <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>.

[The PP has engaged ERMCVS to validate a post-registration change to a small-scale PoA. In this capacity, ERM sought guidance from the CDM Help Desk to clarify whether a registered small-scale PoA can upgrade to the latest version of a methodology if there is no change in technologies or measures of the underlying PoA. The response was as follows:

"I wish to inform you that ver 08.0 of PS, VVS and PCP (which will only enter into force on 1 Apr 2015), allows a registered PoA to upgrade to the latest version of the methodology applying procedures for post registration changes: revision of monitoring plan [para 148 (b) (iv), PCP version 8]). In doing this following rules as mention in version 8 shall be applied: PS : para 283, 284, VVS : section 9.6, para 314 and PCP: para 151, 152. In doing so, the PPs "shall describe the nature and extent of the non-conforming monitoring in a revised PDD, PoA-DD or CPA-DD and the proposed alternative monitoring". Please note that in this case, the PPs have to comply with all the requirements in the later version of the methodology, not only with its monitoring section.

On the side-lines, I also wish to mention that PRC for revision of monitoring plan [para 148 (b) (iv), PCP version 8]) and the PRC for design change [para 148 (b) (v), PCP version 8]) have different objectives: the former is to accommodate a situation where the monitoring cannot be or is not done as per registered monitoring plan, and the latter is to accommodate a situation that the project/programme design has changed after the registration. The types of design changes that are allowed for PoAs are strictly limited (PCP ver 8, para 150) and para 150 (d) of PCP (version 8) does not allow using the later version of the methodology if there is no design change (change to technologies/measures)."

As noted in this feedback, it is not currently possible for a PoA to upgrade to the latest version of a methodology if there is no change to technologies/measures.

Methodologies can be revised under the following conditions:

- New or better scientific understanding suggests emission reductions are not accurately estimated in the existing methodology, or that reductions may not be real, measurable and verifiable;
- There are inconsistencies, errors or ambiguities within a methodology;
- A simplification or clarification can improve user-friendliness.

Considering these conditions, preventing a PoA from updating to a revised version of a methodology can promote less conservative estimation of emission reductions, and disadvantage existing PoAs which must implement less user-friendly procedures. PP therefore requests that guidelines for a post-registration design change be amended to permit adoption of a revised SSC-methodology, even if there is no new technology or measure.]

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).

>>

PP suggests that PCP ver 8, para 150 be amended to include the following:

- (e) Implement an updated version of an applied small-scale methodology (all CPAs must be updated as well).

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

- [N/A]

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat

23 January 2015

Reference number

2015-381-S, INQ-02677

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.
Decision Class: Regulatory Document Type: Form Business Function: Governance		