

**CDM-PA3404-RULE01**

Ruling note

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Rationale for the rejection of PRC-3404-001

Version 01.0



**United Nations**  
Framework Convention on  
Climate Change

1. The CDM-Executive Board decided to reject the proposed request for post-registration changes for CDM programme of activity 3404 on 21 June 2016, in accordance with *the Clean development mechanism project cycle procedure* (CDM-EB65-A32-PROC, version 09.0), paragraph 175 and 177 (the procedures).
  - a) The request for post-registration changes “PRC-3404-001: Rwanda Electrogaz Compact Fluorescent Lamp (CFL) distribution project:
    - i. **Corrections: to the PDD**
    - ii. **Permanent changes to the monitoring plan related to Component 2 of the project activity which applies AMS-II.C methodology:**
      - to adopt the default value of 3.5 hours/day of AMS-II.J for Component 2 of the project activity instead of the monitoring of operating hour as per AMS-II.C;
      - to revise the frequency of the survey for the checks of sample of non-metered systems under Component 2 from annual (as requested by AMS-II.C) to a frequency following the requirements for surveys in AMS-II.J;
      - to include the parameter “Percentage of lamps that are still operating” as a parameter to be monitored for component 2 following the approaches provided by AMS-II.C and AMS-II.J.
  - b) The relevant requirement(s) Permanent changes to the monitoring plan are as follows:
    - i. The applied methodology for component 2 of the project activity (AMS-II.C ver 11) Para 13 states that the Recording the “power” of the device installed (e.g., lamp or refrigerator) using nameplate data or bench tests of a sample of the units installed and metering a sample of the units installed for their operating hours using run time meters;
    - ii. Para 14 states that the Monitoring shall include annual checks of a sample of non-metered systems to ensure that they are still operating.;
    - iii. The applied version of AMS-II.C does not provide provisions to adopt requirements from AMS-II.J when the “Percentage of lamps that are still operating” is monitored.
    - iv. This PRC case has been presented to the SSCWG and during its 50<sup>th</sup> meeting reported that: *The SSC WG was of the view that above proposed revisions to the monitoring plant of Component 2, including the adoption of the default 3.5 hours/day for the operating project lamps could be allowed only if the PP adopts all the requirements of the methodology AMS-II.J related to the calculation of emission reductions and monitoring requirements as component 1. (e.g. application of the lamp failure rate, frequency of the subsequent ex-post monitoring survey, sampling requirements)*
  - c) The reason and rationale for the final decision is:

In relation to the permanent changes to the monitoring plan, the DOE failed to adequately justify the appropriateness:

i) to carry out the survey for Component 2 along with Component 1 by applying the frequency based on “Once for every 30% of the elapsed rated lifetime of the lamp” as per AMS-II.J para 14 and;

ii) to include the monitoring parameter “Percentage of lamps that are still operating” for Component 2 where the percentage could be determined by: i) the formula “1 – LFR” where LFR corresponds to the Lamp Failure Rate calculated as per methodology AMS-II.J.

Considering that the above permanent changes require the application of the ex-ante LFR which has to be compared with the ex-post LFR and the PP has proposed not to include the default value of 50% for parameter “Ri” in the ex-ante LFR. Therefore, these changes will result in emission reductions beyond AMS-II.J requirements.

#### Document information

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