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UNFCCC Secretariat

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**Response to Incompleteness Notification regarding the Request for Issuance of PoA 10431-IR1-SUB1 "Improved cookstove program in Bangladesh supported by the Republic of Korea" (UNFCCC Ref. no. 10431), notification received on 12/02/2019.**

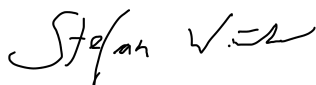
Dear CDM team,

Please find below the response of the TÜV NORD JI/CDM Certification Program to the request for issuance incomplete for the above mentioned POA.

With regard to this response, we would kindly request you to continue with the request for issuance process. If you have any questions do not hesitate to contact us.

Yours sincerely,

TÜV NORD JI/CDM Certification Program



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<b>Request for Registration/Issuance Incomplete Reason (1)</b>	
<b>Scope and Issue raised by the UNFCCC Secretariat:</b>	1: The CPA-DD (page 21) has provided the stove specifications to be implemented (i.e. project stoves shall be fixed or portable type with a fuel grate and/or a chimney). However, the monitoring report does not provide technical specifications of the stoves implemented (refer to the PS-PoA ver. 02 para 259 (c)).
<b>Response by CME:</b>	Section C.1 of the monitoring report has been revised to include the technical specifications of the ICS implemented.
<b>Response by DOE:</b>	Revised MR version 4.0 under section C.1 is assessed by the DOE and found appropriately included with the technical specifications of implemented ICS, which is also in line with onsite observation. Section A of the verification report is also revised accordingly.
<b>Request for Registration/Issuance Incomplete Reason (2)</b>	
<b>Scope and Issue raised by the UNFCCC Secretariat:</b>	2: The surveys for the thermal efficiency were conducted in October 2018. It is noted that, for the parameters “operational ICS and continued use of the baseline devices”, the survey was conducted in 2018. However, no information is provided in the monitoring report to evidence when (dates) the surveys were conducted (refer to the PS-PoA ver. 02 para 263 (c))
<b>Response by CME:</b>	The surveys referred on page 15 of MR, pertain to questionnaire-based surveys conducted for determination of parameters “operational ICS and continued use of the baseline devices”. For measuring thermal efficiency, no surveys were conducted but field water boiling tests (WBTs) were conducted as mentioned in the MR. The usage surveys and WBTs were conducted during 12 – 20 Oct 2018. This has been now clarified in more detail in the revised MR.
<b>Response by DOE:</b>	Information of surveys conducted for parameter of interest in the monitoring report is assessed to be further clarified. The surveys were conducted in the month of October 2018 from 12th to 20th October 2018. CME has revised the MR appropriately in line with onsite verification by the DOE.
<b>Request for Registration/Issuance Incomplete Reason (3)</b>	
<b>Scope and Issue raised by the UNFCCC Secretariat:</b>	3: The DOE visited 17 households (9 from 1- pot stoves and 8 from 2-pot stoves) and interviewed the end users in order to verify the monitored parameters, including the stove thermal efficiency. The DOE shall provide information to clarify how it verified the stove thermal efficiency through interviewing the end users (refer to the VVS-PoA ver. 02 para 350 and 374 (c))
<b>Response by CME:</b>	NA
<b>Response by DOE:</b>	The stove thermal efficiency values were verified by the DOE based on the following: <ol style="list-style-type: none"> <li>1. Review of the WBT protocol</li> <li>2. Review of the WBT data recording sheet and its compliance wrt to WBT protocol</li> <li>3. Review of measuring equipment used during WBTs for calibration and accuracy.</li> <li>4. Review of original test observation sheets and corresponding WBT calculator and ER calculator to verify correct transfer of information from point of monitoring to ER calculator</li> <li>5. Review of WBT calculator for correctness of calculations in line with WBT protocol.</li> <li>6. By conducting interviews of the WBT monitoring team on the following: <ol style="list-style-type: none"> <li>a. Review of the monitoring team prior experience on conducting WBTs.</li> <li>b. Test procedure followed while conducting WBTs to verify their competence towards performing WBTs correctly and accurately and in line with WBT protocol.</li> <li>c. Usage and handling of the monitoring equipment to verify that the measurements were taken by the monitoring staff correctly and accurately.</li> <li>d. Knowledge of the WBT test observation sheet to verify that measured data was recorded accurately and correctly.</li> </ol> </li> </ol>

	<p>7. Additionally, during the field visit the audit team leader interviewed the ICS users (of WBT samples) on the following points:</p> <ol style="list-style-type: none"> <li>The date of visit of WBT team for testing stove, and cross verified that with date of test specified on corresponding test observation sheet</li> <li>The time taken by the WBT team to complete the test and cross verified that with duration of tests specified on corresponding test observation sheet</li> <li>The number of test cycles conducted by the WBT team to be 3 rounds of Cold Start + Hot start each</li> <li>The general test procedure followed by the WBT team to verify that tests were performed in the field properly and in line with the WBT protocol</li> <li>Review of photographs taken by the WBT monitoring team at the time of conducting tests and cross verifying the same during the actual visit (for type of stove and serial number of stove).</li> </ol> <p>Thus, through document review, interviews of WBT team and interviews of end user, the DOE verified the stove thermal efficiency.</p> <p>Verification report under Appendix 5 under Table A-5 has also been accordingly revised.</p>
<b>Request for Registration/Issuance Incomplete Reason (4)</b>	
<b>Scope and Issue raised by the UNFCCC Secretariat:</b>	<p>4: The included CPA-DD (page 16) indicates that the loss in efficiency for the project devices shall be determined following either of the option under paragraph 25 (c) or (d) of the AMS-II.G. ver. 8. However, the applied methodology requires to choose and fix ex-ante only one option.</p>
<b>Response by CME:</b>	<p>Please note the following:</p> <ol style="list-style-type: none"> <li>The CPA-DD on page 16, mentions, “CPAs <b>can</b> use any one of the following options.....”, instead of the term ‘shall’</li> <li>Para 25 of the methodology, states, “The Project participant <b>may</b> choose <b>any</b> option below to account for the loss in efficiency; the option <b>should</b> be identified and fixed ex ante in the PDD at the time of registration”.</li> </ol> <p>The word ‘any’ above is being used as a determiner which, generally, is used to denote <b>one</b> or <b>some</b> and <b>not necessarily</b> only one (<a href="https://en.oxforddictionaries.com/definition/any">https://en.oxforddictionaries.com/definition/any</a>, <a href="https://dictionary.cambridge.org/dictionary/english/any">https://dictionary.cambridge.org/dictionary/english/any</a>).</p> <p>Further the term ‘should’ as per PS for PoA, version 2.0, para 13(b) refers to one course of action being recommended and is not mandated.</p> <p>Thus, as per CME’s understanding, AMS II.G. version 08.0, para 25, does not require choosing only one option ex-ante, and registered CPA-DD is in line with the small-scale methodology.</p> <p>Further, with respect to the concerned monitoring period, please note the following:</p> <p>Both option (c) and (d) as per para 25 of AMS II.G. are applicable after completion of annual period of stove batch covered in the monitoring period. In the concerned monitoring period, there is only one batch (2018 stove population) which was less than one year old, at the time of monitoring (Oct 2018).</p> <p>Thus, the CME/PP, monitored the thermal efficiency of 1-pot and 2-pot stoves, after the end of first monitoring period, and used the measured actual efficiency values of <math>\eta_{\text{new,1-pot,2018}}</math> and <math>\eta_{\text{new,2-pot,2018}}</math> for ER calculations.</p>

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	<p>In light of aforesaid, Option (d) as per CPA-DD, page 16 is <b>deemed used</b> to determine <math>\eta_{new,i,j}</math>, given actual efficiency was measured, although before end of year 1 of the 2018 batch.</p> <p>Subsequently, when the annual period of first batch gets completed, the CME shall determine <math>\eta_{new,i,j}</math> as per option (c) of para 25 of AMS II.G version 8, for all future monitoring periods of this CPA and shall apply the values obtained, to subsequent batches of corresponding ages.</p>
<b>Response by DOE:</b>	<p>As clarified by the CME, the registered CPA DD is deemed in line with § 25 of the applied methodology, as it allows selection of any option and not only one option.</p> <p>Given monitoring period covers only 11 days and the end of year 1 for batch 2018 is not completed, hence, CME's approach of monitoring the thermal efficiency at the end of monitoring period to determine <math>\eta_{new,i,j}</math> is deemed appropriate.</p> <p>Although the CME has categorized the monitoring under option (d), the monitoring approach is assessed to be corresponding to both the options (c) and (d) of § 25 of AMS II.G version 8.0 as the monitoring has been conducted before end of year 1 for batch 2018 / end of annual period.</p> <p>The verification team acknowledges that CME shall be using option (c) of § 25 of AMS II.G version 8.0 consistently throughout the crediting period of the CPA and shall not switch between the two sporadically over the course of crediting period. A FAR (FAR 2) has been raised in this regard.</p> <p>FAR: The verifying DoE shall check that parameter <math>\eta_{new,i,j}</math> is determined using option (c) of § 25 of AMS II.G version 8, for all future monitoring periods of the CPA 10431-0001.</p>