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**Response to Clarification Notification regarding the Request for Issuance of PoA
“Accelerating Electrification through Grid Extension and Off-Grid Electrification in Rural
Areas of Uganda” (UNFCCC Ref. no. 10186), notification received on 30/05/2019.**

Dear CDM team,

Please find below the response of the TÜV NORD JI/CDM Certification Program to the request
for clarification of the PRC for the above mentioned PoA.

If you have any questions do not hesitate to contact us.

Yours sincerely,

TÜV NORD JI/CDM Certification Program


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Request for Clarification (1)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>Page 9 of the CPA-DD states that in the baseline scenario end-user either had access to electricity through carbon intensive mini-grids, stand-alone generators, or utilized other forms of energy (non-electrical) through fossil fuel use. However, such statement is not consistent with page 16 of the CPA-DD and page 18 of the monitoring report, which have excluded the existing consumers (i.e. existing consumers are those who were supplied electricity from the mini-grid system prior to project implementation) from the project boundary.</p> <p>The DOE is requested to provide information on how it has verified the specification of actual electricity consumers of the CPA, including the types of consumers and number of each type. Please refer to paragraph 6 and 10 of AMS III.BB version 2.</p>
Response by CME:	Please refer reply from DOE
Response by DOE:	<p>The CPA-10186-0001 stated objective in section A.3 of the registered CPA-DD is “.....increases access to electricity within the CPA boundary through grid extension, i.e. connecting households and institutions/SMEs to the national grid, who were not connected prior to the implementation of the project activity.”</p> <p>All consumers interviewed did not have a metered connection to the national grid or a mini-grid prior to getting a connection under the CPA, i.e, not existing. The verification team conducted random sample visits including interviews to HHs and SMEs as demonstrated in section D.3 of the verification report. Interviews were also carried out with the CME; the funding agency and staff to ascertain that all connections were new (i.e, $BE_{exist,y} = 0$). Therefore, the types of consumers and their number are determined during implementation, and electricity bands are established as consumption patterns are formed, and this is directly monitored. Please refer to section E.2.2 of the verification reports under enrollment.</p>
Request for Clarification (2)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>Page 2 of the CPA-DD describes the technology to be applied in the CPA as grid extension (i.e. connecting households and institutions/SMEs to the national grid who were not connected prior to the implementation of the project activity). However, page 13 of the monitoring report indicates that the CPA involves generating electricity from renewable electricity systems and supplying the same to end users. The DOE is requested to provide clarity on the actual technology implemented in the CPA (i.e. CPA 10186-0001).</p>
Response by CME:	Reference to the word “renewable and generation” on page 13 of the monitoring reports and other sections has been removed.
Response by DOE:	<p>The CPA-10186-0001 involves grid extension to previously unconnected users by extending the existing distribution lines and providing a prepaid meter. The electricity generating system remains the national grid which serves the CPA purpose. Therefore, the word <i>renewable</i> and generation has been deleted in page 13 and in all sections of both of the MRs</p>
Request for Clarification (3)	

Scope and Issue raised by the UNFCCC Secretariat:	Paragraph 12 of AMS III.BB version 2 requires an ex-ante census of project energy consumers of the CPA which documents the physical location of each consumer and the anticipated connected load and usage hours of each consumer. However, such information was neither included in the CPA-DD, nor reported in the monitoring report. The DOE is requested to provide information on how it has verified the compliance with paragraph 12 of AMS III.BB version 2.
Response by CME:	See DOE response.
Response by DOE:	<p>The information was validated in version 4.0 of the CPA-DD of CPA1 and version 2.0 of CPA-DD of CPA2 (Section D.2). Since version 8.1 of the CDM-CPA-DD-FORM template does not require demonstration of the methodology applicability conditions, the same was excluded in the latest approved CPA-DD versions. However, during implementation and monitoring, the actual load for individual households/SMEs has been established based on the type of connection provided and consumption patterns.</p> <p>As seen onsite and explained in E.2.2 of the verification reports, consumers express interest and the possibility of connection is checked by technicians based on the location of the HH (proximity to a distribution line). Relevant forms are completed and a contract is signed by the consumer with the local service provider (SP office). The forms capture customer names and contact details, location, consumer type (HH or SME), and GPS details (where possible). The same information is loaded into the billing system and a customer number is generated upon completion of the connection. The serial number of the meter installed is also included. No purchase of pre-paid vouchers or power consumption is possible without this vital information in the billing system. The specific consumer, depending on consumption will be stepped up or down from three phase to single phase and vice versa.</p> <p>Therefore, the same information (location, level of usage, hours of usage, type of consumer) is captured during the actual implementation and monitoring stages.</p>
Request for Clarification (4)	
Scope and Issue raised by the UNFCCC Secretariat:	Paragraph 32 of the applied methodology (i.e. AMS-III.BB version 2) requires considering leakage on account of construction of new transmission/distribution lines (e.g. carbon stock loss due to deforestation). However, in this request of issuance, leakage is considered as zero despite of the statement that medium to low voltage distribution lines are constructed (i.e. page 20 of the monitoring report). In addition, such statement in the monitoring report is not consistent with page 37 and 38 of the verification report, which states leakage is neglected in line with the methodology as it contributes to less than 5% of the ex-ante estimated emission reductions. Besides addressing the inconsistency, the DOE shall also provide evidence on how it has concluded that the leakage due to deforestation is within 5 per cent of the estimated emission reductions of the project.
Response by CME:	Language has been modified to reflect that no transmission or distribution lines are constructed under the activities covered by the POA and underlying CPAs. Only the line from the existing line to the household as well as the wiring of the house, and installation of the electricity meter is covered by the activities under the programme.
Response by DOE:	Only extension of existing distribution lines into homesteads occurs and this was confirmed onsite and via interviews with officials of the rural electrification agency (CME) and the funding body (ref. CAR 03). The DOE can confirm that no deforestation occurs. It is therefore accurate that no leakage on this account is considered in this PoA, in line with the applied

	methodology. The specified sections of the MR have been revised as well as section E.3.5.3 of the verification report
Request for Clarification (5)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>In accordance with the approved PRC (i.e. PRC-10186-002), the emission factor (i.e. $EF_{grid,CO_2,y}$) for project emissions is to be determined as per paragraph 46(c) of AMS III.BL version 1, which provides two alternatives (i.e. zero can be applied if the share of renewable energy mix is greater than 95%; or default emission factor prescribed in the Table 6 of the most GHG intensive fuel used in the national or regional grid). In this request for issuance, an EF of zero is to be applied by claiming that the percentage of renewable energy mix in the grid for the previous 3 years (2014, 2015, and 2016) is 96.04 % (page 32 of the verification report). However, (a) such calculation sheet of the renewable energy mix is not submitted; (b) it is not clear how the electricity imported is considered, given the fact that the host country (i.e. Uganda) imports electricity from both Kenya and Rwanda (page 28 of the verification report); and (c) the value of $EF_{grid,CO_2,y}$ was projected as 0.513 tCO₂/MWh (page 11 of the CPA-DD) at the time of requesting for PRC approval.</p> <p>The DOE is requested to provide:</p> <ul style="list-style-type: none"> (a) the calculation sheet of the renewable energy mix; (b) clarity on the basis of the projected EF of 0.513 tCO₂/MWh, when requesting for PRC approval; and (c) information on how it has verified the compliance of the applied EF (i.e. zero) with paragraph 34 of the applied methodology (i.e. AMS-III.BB version 2), in particular footnote 6 under the paragraph 34.
Response by CME:	<ul style="list-style-type: none"> (b) A statement has been added that imported electricity is treated as non-renewable for the purpose of determining the fraction of renewable energy.
Response by DOE:	<ul style="list-style-type: none"> (a) The calculation is provided now with this submission. Imported electricity has been treated as non-renewable for the purpose of determining the fraction of renewable energy. (b) The 0.513 tCO₂/MWh was an ex-ante value (estimate) of the grid emission factor, derived from the standardized baseline ASB0006_v1.0, valid at the time. However, as stated in the PoA-DD and revised CPA-DD section B.5.1, this will be a monitored parameter and only used ex-ante for sample calculation to comply with the CDM-PoA-DD-FORM filling requirements (please refer to FAR 01 in both MP1 and MP2 reports). (c) This is not applicable when applying the 95% rule in §46 c) (i) of the AMS-III.BL for LDCs. This was the basis for a permanent deviation from AMS.III-BB version 2.0, to AMS.III-BL version 1.0 in the calculation of $EF_{grid,CO_2,y}$ in the PRC.