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TÜV®

CDM Executive Board

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Response to the Request for Review of the Programme of Activities (PoA) "Impact Carbon Global Safe Water Programme of Activities (PoA)" (UNFCCC Ref. no. PoA9948)

Dear Honourable Members of the CDM Executive Board,

Please find attached the response of TÜV NORD to the review of the above mentioned the Programme of Activities, UNFCCC Ref. no. PoA9948.

The PP has authorized us to submit their review response in the attached consolidated document. The content of this response remains in the sole responsibility of the PP.

In so far as actions from the PP were to be taken the TÜV NORD response has taken those actions into account.

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

Yours sincerely,

Stefan Winter
Head TÜV NORD JI/CDM Certification Program

Review Issue # 1	
Original text of the issue raised:	Refer to paragraph: VVS-PoA ver. 02 paragraph 340(a) The included CPA-DDs (Section A.3) and the monitoring report (Section C.1) indicate that the implemented water purification devices, i.e. UltraFlo and Multi-barrier UV, are fixed and applicable to piped water. However, the emission reduction (Tab "Sales Database-MS1" and "Sales Database-MS2", column Q) indicates the primary water source for some institutions other than piped water, i.e. surface water, wells, boreholes, rainwater and others. Therefore, the DOE shall verify how it determined that the water purifiers are implemented in accordance with description contained in the included CPA-DDs, in particular with regard to the piped water application.

PP´s Response

The "Piped Water" cited as the application in Section A.3 of the CPA-DDs for both Multi-Barrier UV and UltraFLO Chlorination systems refers to pressurized piped water connection that is a pre-requisite for these two types of systems by virtue of their design. Thus, Both Multi-Barrier UV and UltraFLO systems can only be installed on piped applications only.

In the emission reduction spreadsheet, tab "MP2 Sales Database-MS1" and "MP2 Sales Database-MS2", column Q, on the other hand, refers to the water source from where the water is extracted instead (to add more transparency). In case of Multi-Barrier UV and UltraFLO Chlorination WPS, primary water sources like the surface water, wells, rainwater etc. have a piping connection installed to transport water from these primary sources to the point of installation of project device.

Please note that schools having Primary Water Source marked as "Piped" in Column Q, refers to only City Council / Government / Municipal Water Piped Connection in the school as the Primary Water Source.

For further detail, please refer to the table below:

Source of Water	**# Multi Barrier UV Schools**	**# Multi Barrier UV Schools**	**# UltraFLO Schools**	**Comments**
	MP2 - MS1	**MP2-MS2**		
Well /Borehole	39	71	3	These wells/boreholes are connected to drinking water storage tanks via pipes. The water is pumped from wells/boreholes to these water storage tanks. The Multi-Barrier UV or UltraFLO Chlorination WPS is fitted in the tanks at the inlet to ensure that any water flowing in the tank is treated and rendered safe for drinking. The outlet of the tank is connected to the taps to facilitate drinking of water by the school students and staff.
Surface Water	7	21	3	There is a private piped connection used for transporting water from the nearest water body source to the drinking water storage tank in the school premises. Multi-Barrier UV or UltraFLO Chlorination system are fitted onto these piping connections same as that explained above
Rainwater	15	28	4	The rainwater is collected in a sump from where it is pumped via pipes to the drinking water storage

				tank, to which the Multi-Barrier UV or UltraFLO Chlorination system are fitted same as that explained above.
Others	2	2	-	Similar to above, these schools have a combination of aforesaid water sources (wells, surface or rainwater sump), depending on ease of access to the school to which Multi-Barrier UV or UltraFLO Chlorination WPS are connected as explained above

This has been verified by the DOE during the on-site visit during the previous monitoring period. This was also checked by verification team during the remote audit in the current monitoring period. For MP2-MS1, the DOE's audit samples included 1 Multi-Barrier UV school each connected via pipes to source "Other" and "Surface water". Similarly, for MP2-MS2, the DOE's audit samples included 1 Multi-Barrier UV school each connected via pipes to source "Surface Water" and "Well/Borehole". In all these 4 samples the DOE team was able to verify the school to have operational Multi-barrier UV system receiving water from the quoted primary water source and connected via pipes to the drinking water storage tank. Thus, the project devices have been implemented in line with the description provided in the CPA-DD / MR.

DOE´s Response

From technological aspect, Multi-Barrier UV and UltraFLO systems are fixed type of water purification systems (WPS) and can only be utilised on piped water connections. These two types of water purification units can work only when they are fitted on a piped connection and water flows through them. Hence, implemented technologies are in line with the CPA-DDs (section A.3.) and the monitoring report (section C.1) which correctly mention that Multi-barrier UV and UltraFLO are fixed type systems and applicable on piped water. The verification team physically verified the same, during the pervious verification (MP1). Additionally the verification team confirmed the project technology implementation on ground, remotely during this verification (MP#2), by applying other means of verification.

The ER sheet, tab "MP2 Sales Database-MS1" and "MP2 Sales Database-MS2", column Q 'Primary water source' lists the source as surface water, wells etc. besides piped water. The term "piped" water under this column has been used for the schools which receive water from City Council / Government / Municipal Water Connections. It shall be noted that water is transported from primary water sources such as wells, surface water and boreholes through pipes to water storage tanks in project schools. The fixed multi barrier UV and Ultra-FLO systems installed on these pipes as verified during assessment.

During the remote site audit done for the current issuance request, as well as during the physical site-visit done for previous batches verification, it was evident to the verification team that UltraFLO and Multi barrier UV systems have only been installed on pipeline connections, in cases where the primary water source is different from City Council / Government / Municipal water connection.

Thus, it can be confirmed during this verification that the CPAs, including related water purification systems, i.e. Multi-Barrier UV and UltraFLO systems, have been implemented in line with the validated CPA-DDs and correctly described in the monitoring report in section C. CL 01 has been reopened and the assessment has been updated.

Review Issue # 2

Original text of the issue raised:	Refer to paragraph: AMS-III.AV. ver. 04 paragraph 15 The DOE shall further substantiate how it has verified the compliance of the monitoring plan with the applied methodology, in particular the monitoring frequency of parameter "operational units", since the CPA-DDs states that the monitoring frequency for the parameter as "At least once per verification or biennially as per the monitoring

	requirements in the methodology", which could lead to possibilities whereby the monitoring frequency not meeting methodology requirement (i.e. at least once every two years) when the verification / monitoring period is conducted with a time gap of more than two years.

PP´s Response

Please note that the term "at least" is binding to both "once per verification" as well as "biennially as per the monitoring requirements in the methodology" and not to "once per verification" alone. Thus, under no circumstances, the monitoring frequency will extend beyond two years and shall remain compliant with the monitoring methodology requirement always.

Further, please refer the PoA validation report, CAR 07, page 80 of 106 which states the following:

> The PP revised the monitoring frequency to be "At least once per verification or biennially as per the monitoring requirements in the methodology" to ensure that the methodological requirements are met (at least biennial) and that each verification is based on relevant monitoring results.

Thus, this substantiates that "at least once per verification" was provisioned in the PoA-DD to prohibit the CME apply the value established in a given MP to the following MP (without monitoring it again) for cases where the combined length of two consecutive MPs is less than two years.

Please refer all previous monitoring periods for different batches where dedicated monitoring for each monitoring period has been conducted despite them being even less than one year duration. Also, for the first monitoring period, although the monitoring period was longer than 2 years (30/05/2014 – 22/05/2017) and was covered under single verification, the CME did not claim any ERs for the period 30/05/2014 – 21/05/2015 and followed the "at least biennially" monitoring frequency to ensure that methodology prevails over such cases.

Hence, the CME affirms that in no case the methodology requirements with respect to monitoring frequency would be compromised.

DOE´s Response

The applied methodology AMS-III.AV. version 4.0, para 15, states that "Monitoring shall consist of checking of all appliances or a representative sample thereof, at least once every two years (biennial) to ensure that they are still operating or are replaced by an equivalent in service appliance".

The CPA-DDs (9948-P1-0002-CP1、9948-P1-0014-CP1 to 9948-P1-0022-CP1) mention under section B.5.1., that for the parameter 'Operational Units$_i$', the frequency is 'at least once per verification or biennially as per the monitoring requirements in the methodology'. For the current issuance request, the frequency required by the applied methodology has been met.

As explained by CME and confirmed by the verification team, in all previous verifications (monitoring periods), the monitoring frequency was found to be adhering to the methodological requirements.

Further, the DoE also assessed the PoA validation report CAR 07, page 80 of 106 which confirms that "at least once per verification" is superseded by "biennial" and the methodology requirements prevails.

However, to ensure that under no circumstances, the methodology requirement is compromised in future, a FAR has been raised in leu of assessors review question to ensure that monitoring frequency of parameter "operational units$_i$", shall be, 'at least once per verification or biennially, whichever is earlier'.
Furthermore, the DOE already raised this issue under CL 01, DOE assessment dated 04/11/2020, point c). The subsequent PP response has also been properly assessed.
However, FAR 01 (a) was raised.

Review Issue # 3	
Original text of the issue raised:	Refer to paragraph: VVS-PoA ver. 02 Paragraph 304 (c) The DOE cross-verified continuous availability of safe drinking water based on the interviews with the users, maintenance records and delivery notes and further confirmed (page 42 of 92) that the subsequent supply product IDs are captured on the emission reduction spreadsheet. However, the following is observed in the submitted emission reduction spreadsheet: (a) There is no verification opinion on the implemented water purifier capacities (Tab "Assumptions" cells D10 and D11) of 340,000 L/unit (for UltraTab purifier) and 4,088,232 L/unit (for Multi-barrier UV water purifier); (b) The residual capacity (i.e. Tab "Sales Database" column AQ) data is not traceable; (c) The residual capacity of some purification devices indicates system continuous running until year 2077 and more (i.e. Tab 'Sales Database' cells 'AY711) which is even beyond the device lifespan (i.e. 5 years); (d) Although the Tabs "Monitored samples_MS1" and "Monitored samples_MS2" Column H indicate the delivery dates of the tablets/cartridges, worksheet Tabs "sales database_MS1" and "sales database_MS2" (column AR) indicate that no supplies were delivered to any school. Taking into account the above, the DOE is requested to (a) substantiate how it has verified and concluded the installed water purifier capacities of 340,000 L/unit (for UltraTab purifier) and 4,088,232 L/unit (for Multi-barrier UV water purifier), (b) submit a traceable emission reduction spreadsheet for the calculation of the system residual capacities, (c) elaborate how a system's continuous running end date can be beyond its lifespan (5 years), (d) substantiate continuous availability of safe drinking water to schools considering some water purifiers had no residual capacity from the previous monitoring period and received no supplies during the current monitoring period.
PP´s Response	
Please refer the following in this regard: (a) The capacity of 340,000L/unit (for UltraFLO) and 10,000L/unit (for UltraTAB) stated in worksheet "Assumptions" is consistent with latest version of registered CPAs 16-22 CPA-DDs page 4. The capacity of 4,088,232L/unit (for Multi-barrier UV Large) and 2,044,116L/unit (for Multi-barrier UV Small) is sourced from Manufacturer technical specifications. The CME accepts oversight in ER spreadsheet assumption tab where the reference for the Multi-Barrier UV system capacity is mentioned as CPA-DD. Revised ER sheet is being submitted. (b) For MP2-MS1, the 'system's residual capacity from previous monitoring period' (MP2 Sales Database-MS1, column AQ) has been sourced from MP1 sales database submitted to UNFCCC as part of MP1 ER calculator (https://cdm.unfccc.int/PoAIssuance/iss_db/poaiss757932161/view, Refer: additional documents). The CME extracted the above information from MP1 ER calculator (tab Sales database, Column BA) by applying the vlookup function, using School SF ID as a unique identifier, to call this information in MP2 ER calculator, tab: MP2 Sales database-MS1, column AQ. Given the vlookup function does not work externally, hence the CME had to remove the external links in the MP2 Sales	

Database-MS1, column AQ, which otherwise would have returned #Ref error in excel, once shared with DoE / UNFCCC.

The CME has now presented 'MP1 sales data – reference only' in revised MP2 ER calculator being submitted. The column AQ of 'MP2 sales database-MS1' has now been linked with column BA of 'MP1 sales data – reference only' to establish full traceability of values for 'residual capacity from previous MP'. For systems that are newly installed in MP2-MS1, column AQ in tab 'MP2 Sales Database-MS1' now indicates, "not applicable, new installation" to avoid any confusion. Similarly, the column AQ of 'MP2 sales database-MS2' has been linked with column BA of 'MP2 sales database-MS1'. For systems that are newly installed in MP2-MS2, column AQ in tab 'MP2 Sales Database-MS2' now indicates, "not applicable, new installation".

(c) The "system's continuous running end date" is not depicting the lifetime/lifespan of the device. It is merely a determinant to check the compliance with the following registered monitoring plan requirement:

($N_{y,i}$ * $R_{y,i}$) should not exceed the maximum output capacity of the system installed.

1. The system's initial installation capacity or residual capacity from previous MP (as applicable) coupled with supplies made during the monitoring period is used to calculate total treatment capacity per unit (in column AW).
2. The ($N_{y,i}$ * $R_{y,i}$) provides the per day water consumption in school (in column AV).
3. System's continuous running end date (column AY) is then determined as ratio of "Column AW" and "Column AV".
4. If the continuous running end date is falling before the end of monitoring period, this indicates that the ($N_{y,i}$ * $R_{y,i}$) exceeds the system's maximum output capacity during the monitoring period. In such cases the operational days of the unit in that school (refer column BE) is limited within the monitoring period.
5. On the other hand, if this date is after the end date of monitoring period, this indicates that ($N_{y,i}$ * $R_{y,i}$) does not exceed the maximum output capacity during the monitoring period and hence the system can provide continuous supply till the end of the monitoring period .

This functionality in the ER model ensures that ($N_{y,i}$ * $R_{y,i}$) does not exceed the maximum output capacity for any school and operational days are calculated accordingly as per information in column AZ (corresponding to the monitoring period).

In some cases the continuous running end date is a very forward date because the per day water consumption in the school is very low (due to low student staff count) and hence the ($N_{y,i}$ * $R_{y,i}$) will not exceed the treatment capacity till that date. Hence, the continuous running end date is merely a determinant and is not linked with lifetime/lifespan of project devices.

The lifetime of Multi Barrier UV system has been cross-verified from the manufacturer specifications by the DoE. Besides, please note that the earliest Multi-Barrier UV system in Uganda were installed in 2014 and hence will not expire before 2021. Besides, the UV bulb can be replaced to further extend the Multi-Barrier device lifetime further after 7 years. For UltraFLO the lifespan/expiry stated in MR is consistent with that specified in CPA 16-22 CPA-DDs page 4. In case of UltraFLO, the expiry is 5 years with the earliest UltraFLO device being installed in June 2018 in Uganda and hence no UltraFLO device shall expire before the end of the monitoring period.. Besides, every-time a school receives a new supply UltraFLO cartridge, the lifetime of the UltraFLO system is automatically deemed renewed, the supplies being a consumable.

(d) Please note that column AQ in 'MP2 Sales Database-MS1' and 'MP2 Sales Database-MS2' show a

value of 0 if there is no residual capacity from the previous monitoring period and show "not applicable, new installation" in case of new installations in the concerned MP-MS#. Please refer the following in this regard:

Description	MP2-MS1 Identifier	MP2-MS2 Identifier
1) Schools with no residual capacity from the previous monitoring period	Select value "0" in column AQ in MP2 Sales Database-MS1	Select value "0" in column AQ in MP2 Sales Database-MS2
2) Schools with no residual capacity from previous monitoring period and received no supplies during the current monitoring period	Simultaneously Select value "0" in column AR in MP2 Sales Database-MS1	Simultaneously Select value "0" in column AR in MP2 Sales Database-MS2
3) Total number of systems identified	6	51
4) Operational days for these schools	0 (refer column BE, MP2 Sales Database-MS1)	0 (refer column BE, MP2 Sales Database-MS2)

Thus, for the schools in (3) above, the operational days have been calculated as 0 because there is no residual capacity from previous MP, neither continuous supplies have been made to the school in the current monitoring period.

On the other hand, "not applicable, new installation" cells in column AQ in 'MP2 Sales Database-MS1' and 'MP2 Sales Database-MS2' indicate that these systems are newly installed in the respective monitoring session and did not have any residual capacity from previous MP. This is verifiable against their installation dates which falls in the corresponding monitoring session. These systems provide continuous safe drinking water in the monitoring period by virtue of their initial installed capacity, even if no subsequent supplies have been made in these schools. Thus, the ER sheet is correctly ensuring that only those schools are credited that either have residual capacity from previous MP and/or, have received supplies and/or have been newly installed in the monitoring period.

Further, the monitoring survey sheet, in column H, indicates the latest date of Maintenance in case of Multi-Barrier UV and date of cartridge supply in case of UltraFLO, at the time of monitoring. For Multi-barrier UV systems, the date specified is the date of routine maintenance made during MS1 or MS2 given no UV bulb replacements were made during the monitoring period. In case of 7 UltraFLO systems in the monitoring survey sheet (applicable to MS2 only), the date specified is the date of initial installation (except for 1 case) substantiating that the information in Sales Database is correct. Only for one UltraFLO system (SF ID U1807597), the date of subsequent supply is mentioned as 25 Sep 2019 which is after the end of monitoring period but before the date of monitoring visit. Usually, the monitoring is conducted after sometime from end of monitoring period (mobilization time for monitoring teams). Thus, it is possible that this sampled school received supplies after the end of concerned monitoring period but before the monitoring event. The sales database on the other hand, must only report the supplies received during the monitoring period to correctly calculate the ($N_{y,i}$ * $R_{y,i}$) determinant as explained in previous response. The header in the monitoring survey summary sheet has been corrected to further clarify this.

DOE´s Response

(a) The Water Purification Systems's capacity is found correctly stated in ER sheet ('Assumptions' tab) for UltraFLO and UltraTab as verified from the registered CPA-DDs for CPAs 16 - 22 (section A.3., table on page 4, capacity). The capacity for Multi Barrier UV was verified against the manufacturer's specification as the capacity was not found mentioned in the CPA-DD for CPAs 02, 14 or 15. The

verification against manufacturer's specification has already been reported in CAR 02 and in Appendix 3(item number 18, 19) of the FVR. The ER sheet has been found to be revised with regards to mention the correct reference for Multi barrier UV capacity, thus, same is accepted by the verification team.

(b) Please refer Section E.3.6.1 of the verification report (FVR) with respect to the issue related to system's residual capacity. Additionally to the conclusion in section E.3.6.1, where it is confirmed that the values of 'residual capacity from previous MP' in MP2 ER spreadsheet (tab: "MP2 Sales Database-MS1" and "MP2 Sales Database-MS2", column AQ) were verified to be correctly calculated after cross-checking with MP1 ER calculator, the verification team further confirms the following:

- In the revised MP2 ER Calculator, the MP1 Sales database has been added (Tab: 'MP1 Sales data – reference only') by the CME. The verification team has verified that the information in the revised ER Calculation spreadsheet, Tab: 'MP1 Sales data – reference only' is consistent with the tab: 'Sales database' in the MP1 ER calculator, available at: https://cdm.unfccc.int/PoAIssuance/iss_db/poaiss757932161/view . Further, in the revised ER sheet, tab 'MP2 Sales database – MS1' column AQ, the residual capacity from previous MP has been found to be appropriately linked with 'MP1 Sales data – reference only', column BA, which is found to be completely traceable. The verification team independently downloaded the MP1 ER Calculator from PoA page (9948-MP1-IRP1) and cross-verified the information in the revised ER Calculation spreadsheet, Tab: 'MP1 Sales data – reference only' and found it to be consistent.
- In the revised ER sheet, 'MP2 sales database-MS1', column AQ, for all systems newly installed, the 'residual capacity from previous MP' is also found to be correctly specified as "not applicable, new installation".
  Thus, 'residual capacity from previous MP' is confirmed to be calculated correctly in column AQ of MP2 Sales database-MS1 for all schools. Similar, the 'residual capacity from previous MP' for MP2 Sales database -MS2 is also found to be correctly calculated for all schools based on residual capacity at the end of MP2-MS1, as well as this is independently verified by the verification team.
- Lastly, the residual capacity at the end of a given MP (column BA) is calculated as a function of Total daily consumption of drinking water (column AV) and the duration by which a system's continuous running end date (column AY) extends beyond the end date of the monitoring period. This approach is equivalent to discounting the total available treatment capacity (in column AW) at the rate of total daily consumption (column AV) over the entire monitoring period duration to arrive at 'residual capacity remaining at the end of MP'.
- Given the credits are only being calculated for actual school days and not for entire duration of monitoring period, the aforesaid approach shall result in 'residual capacity remaining at the end of MP' (which gets carry forwarded to next MP as opening capacity) rendered most conservative.

In Addition a traceable emission reduction spreadsheet is submitted with this response.

(c) The continuous running end date is merely a determinant to check compliance with the registered monitoring plan requirement. The continuous running end date is a calculated value based on the total available treatment capacity and the total water consumption per day and it indicates the date by which the available capacity will get fully consumed. If the total daily water consumption is low, the available capacity will get consumed over a longer period which may extend as far as 2077 or beyond.

The verification team confirms that this is a representation to objectively ensure that operational days remains lower of (Ny,i * Ry,i) and available output (capacity) and that is not linked to lifetime.

The DoE has checked the capacity / lifespan of UltraFLO / UltraTAB devices against the CPA-DDs (9948-P1-0016-CP1 to 9948-P1-0022-CP1) and manufacturer specifications (for Multi Barrier UV) as applicable. No devices installed are found expiring their lifetime before the end of the concerned monitoring period.

(d) The subsequent supplies to any school are found depicted under column AR of the worksheet titled "MP2 Sales Database-MS1" and "MP2 Sales Database-MS2". The subsequent supplies are required in cases where the residual capacity from the previous period is 0. If the residual capacity is high and sufficient for the current period, then no new supplies are required to be sent to the schools. The schools which have '0' residual capacity in the current MP, if 0 subsequent supplies have been provided, then no ERs have been claimed, as evident and visible in column BE of the same worksheet where number of operation days have been considered as 0 (cases with 0 residual capacity from previous MP and 0 subsequent supplies).

For other systems (systems with residual capacities from previous MP or with subsequent supplies during monitoring period, or newly installed) the operational days have been calculated accordingly. The DoE has assessed and verified all corresponding calculations and found them accurate and appropriately demonstrated.

Thus, the CME has followed the implementation plan stated in the validated CPA-DDs and accrued ERs for the systems that are rendering clean water during the current monitoring period.

The assessments above are based on the review of the following:

1. capacity / lifespan specified in CPA-DDs for Chlorination systems
2. capacity / lifespan as per manufacturer specifications for Multi Barrier UV systems
3. Revised MP3 ER calculator with traceable residual capacity from previous MP/s
4. Conservative calculation of residual days at the end of current MP
5. Continuous running end date being a theoretical determinant and not representing the device lifetime

The verification team confirms and concludes that capacity of the devices (installed actual capacity or residual capacity from previous MP and residual capacity at the end of the current MP) have been correctly determined. The installed systems are capable of continuously supplying safe drinking water over the concerned monitoring period and ERs stated in the monitoring report and corresponding ER calculation spreadsheet are correct, traceable, accurate, credible and conservative. CL 01 has been reopened and assessment has been updated.

Review Issue # 4

Original text of the issue raised:	Refer to paragraph: VVS-PoA ver. 02 paragraph 259(d) The DOE shall further substantiate how it has verified the appropriateness of applying the entire days covered by the monitoring period when calculating parameter QPWy (i.e. quantity of purified water for drinking during the year y), given the facts that the systems do not service the population (i.e. the students) during the school holidays.

PP´s Response

The number of days in ERs Summary tab, has been adjusted to correspond to only operational school days instead of complete duration of the monitoring period.

As a conservative measure, the school academic calendar, as issued by the Federal Ministry of Education and Sports, Uganda has been used to determine the total school term days within the monitoring period. Subsequently, the CME has only considered weekdays (excluding weekends and public holidays for boarding and non-boarding users alike, although boarding students/staff will consume water during weekends) for determining the school days for which WPS should be credited as a conservative measure.

The QPWy has been discounted accordingly in ERs Summary by applying an adjustment factor in E6:N6, tab ER Calculation-MS1 and E6:N6, tab ER Calculation-MS2. This results in reduction of emission reduction to 67,376 tCO2e
DOE´s Response
In the applied methodology / registered PoA-DD, CPAs do not have provision to account for school holidays. However, based on the request for review, the CME has discounted the school holidays (refer tab: MS1-MS2 School days) from monitoring days on the basis of published and objectively verifiable government data (Academic school calendar). The school term duration and corresponding term holidays are found to be correctly calculated as per the submitted academic school calendars for the period 2017, 2018 and 2019 (to cover the entire monitoring period from 23 May 2017 – 22 May 2019). Further, the CME has excluded all weekend days for day schools and boarding schools alike. The approach of not considering weekends for boarding staff and students is deemed highly conservative. The discount factor applied has been checked and confirmed as correctly calculated. The revised achieved emission reductions of the current monitoring period are confirmed to be conservative, accurate and credible. CL 01 has been reopened and the assessment has been updated. Additionally FAR 01 (b) has been raised.